

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AUTOMOTIVE TECHNOLOGIES
INTERNATIONAL, INC.,

Plaintiff,

v.

AMERICAN HONDA MOTOR COMPANY,
INC., ELESYS NORTH AMERICA, INC.,
and GENERAL MOTORS CORPORATION,

Defendants.

C.A. No. 06-187-GMS

**OPENING BRIEF IN SUPPORT OF DEFENDANTS'
JOINT MOTION TO TRANSFER PURSUANT TO 28 U.S.C. § 1404(a)**

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June 7, 2006

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NATURE AND STAGE OF THE PROCEEDINGS

On March 17, 2006, Automotive Technologies International, Inc. (“ATI”) filed this action against Elesys North America, Inc. (“Elesys”), General Motors Corporation, Inc. (“GM”), and American Honda Motor Company, Inc. (“Honda”)¹ for alleged infringement of eleven patents.² On May 3, 2006, ATI filed a First Amended Complaint, adding two additional patents and withdrawing one of the previously asserted patents. Therefore, currently there are twelve patents at issue in this case. Defendants jointly move to transfer this case to the Eastern District of Michigan. This is defendants’ opening brief in support of their motion to transfer.

SUMMARY OF ARGUMENT

This case involves the automotive industry, which is centered in Detroit. Each of the parties in this case has offices in or near Detroit. Most of the witnesses and documents in this case are located in or near Detroit. ATI filed all five of its prior patent infringement cases in the federal court in Detroit, the Eastern District of Michigan. Given these facts, prosecuting this case in Delaware makes very little practical sense.

This Court has very little connection with the parties, the material witnesses or the complained of conduct. This Court is not a convenient forum for deciding this case, and keeping the case here would unnecessarily burden the Court and the parties. A more appropriate – and the most logical – forum is the Eastern District of Michigan, which is where this case could and should have been brought in the first place.

¹ The correct name for this defendant is American Honda Motor Company, Inc.

² On April 6, 2006, this Court granted defendants until June 12, 2006, to move, answer or otherwise plead.

Therefore, the Court should exercise its discretion under 28 U.S.C. § 1404(a) to transfer this case to the United States District Court for the Eastern District of Michigan.

STATEMENT OF FACTS

According to its website, ATI is a Denver, North Carolina-based company involved in the research and development of safety products. Although Plaintiff ATI is a Delaware corporation, ATI does not appear to have any facilities, employees or other physical presence in Delaware. Instead, ATI maintains offices in the Eastern District of Michigan, in Auburn Hills and Romeo, Michigan. (Tab A, D&B Report).³ ATI's Michigan presence is further confirmed by its listing in the *Michigan Automotive Research & Development Directory* 16 (2d ed. 2005) (Tab B). In addition, ATI's President, David S. Breed, who is also one of the named inventors on each of the patents in suit, is believed to maintain a residence in Pentwater, Michigan. (Tab C). None of ATI's material witnesses is believed to reside in Delaware.

Defendants in this case all have a significant presence in the Eastern District of Michigan. Although it is a Georgia corporation, Elesys, the supplier of the accused products, has a safety facility in the Eastern District of Michigan, at Plymouth, Michigan, where the accused products are developed, tested, calibrated, marketed and sold. (Tab D, Kobayashi Declaration, ¶¶ 3-5). Because these activities are centered in Michigan, several potential Elesys witnesses having personal knowledge of relevant facts are located in the Eastern District of Michigan, including by way of example: Susan McCarthy – Elesys VP of Sales and Marketing; Esther Anderson – Systems Engineer; and Monir Ahmad – Senior Electrical Engineer. (Id. at ¶ 6).

³ ATI also appears to have a branch office in Boonton, New Jersey. (*Id.*).

While GM is a Delaware corporation, its global headquarters is in Detroit, Michigan and its technical, design and R&D facility is in Warren MI – both in the Eastern District of Michigan. (Tab E, Ressler Declaration, ¶ 2). GM transacts substantially all of its business with respect to the accused products through its Michigan facilities. GM’s purchasing decisions involving the accused products are made in Warren, as are GM’s engineering and development activities concerning the accused products. (*Id.* at ¶¶ 3-4). GM’s potential material witnesses are likewise located in the Eastern District of Michigan, including for example: Galen Ressler – Lead Engineer, Airbag Supression, Romeo Garcia – Lead Engineer, Karen Morley – Lead Engineer, Joe Gleason – Performance Engineer, Tim Hill – Sensing Performance Engineer, Tona Gipson – Global CT Leader. (*Id.* at ¶¶ 5).⁴

In addition, the accused products are incorporated into the seats ultimately used in GM vehicles by third-party seat manufacturers. These seat manufacturers all have offices in the Eastern District of Michigan. (Tab D, ¶ 9). The seat manufacturers issue purchase orders to Elesys that have a choice of law provision designating Michigan law. (*Id.* at ¶ 10). The purchase orders issued by one of the seat manufacturers also contains an arbitration clause that requires disputes involving the subject matter of the purchase orders to be arbitrated in Detroit, Michigan. (*Id.*). Elesys also has contracts with GM with respect to the accused products. These contracts also contain a choice of law provision identifying Michigan law. (*Id.* at ¶7).

⁴ GM has an assembly plant located in Wilmington, Delaware. However, the GM models assembled in GM’s Wilmington plant do not incorporate the accused products from Elesys.

Honda is a California Corporation. Honda and its affiliated companies maintain multiple offices in the Eastern District of Michigan. These offices are located in Ann Arbor, Detroit and Southfield, Michigan. (Tab F, Bonawitz Declaration, ¶ 2). However, most of Honda's activity with respect to the accused products takes place in neighboring Ohio. Honda's testing and development efforts with respect to the accused products are conducted by Honda affiliate, Honda R&D America's, Inc., in Raymond, Ohio. (*Id.* at ¶ 4). The Honda witnesses knowledgeable about these activities, as well as the implementation of the accused products in Honda vehicles are likewise located in and around Raymond, Ohio. (*Id.* at ¶ 5). Raymond, Ohio is several hundred miles closer to the Eastern District of Michigan than it is to the District of Delaware.

ARGUMENT

I. TRANSFER TO THE EASTERN DISTRICT OF MICHIGAN IS APPROPRIATE

A. The Governing Legal Principles

Section 1404(a) provides that a district court may transfer an action to any other district where it could have been brought if warranted by the convenience of the parties and witnesses, and if the proposed transfer is in the interest of justice. 28 U.S.C. § 1404(a); *Affymetrix, Inc. v. Synteni, Inc.*, 28 F.Supp.2d 192, 196 (D. Del. 1998) (Sleet, J.). It is the movant's burden to establish that a transfer is appropriate. *3Com Corp. v. D-Link Systems, Inc.*, No. 03-014-GMS, 2003 U.S. Dist. LEXIS 7120, at * 2 (D. Del. Apr. 25, 2003) (Sleet, J.) (quoting *Jumara v. State Farm Ins. Co.*, 55 F.3d 873, 879 (3rd Cir. 1995)). When considering a motion to transfer, a court should determine whether, on balance, the litigation would more conveniently proceed and the interest of justice be better served by transfer to a different forum. *Id.* The inquiry involves a multi-factor

balancing test embracing not only the statutory criteria of convenience of the parties and the witnesses and the interest of justice, but also any other relevant factors, including certain private and public interests. *Id.* at *2-3.

The private interests include the plaintiff's choice of forum, the defendants' preference, whether the claim arose elsewhere, and the location of the books and records, to the extent they could not be produced in the transferor forum. *Id.* The relevant public interests include the enforceability of the judgment, practical considerations that would make the trial easier, more expeditious or less expensive in the proposed transferee forum, the relative administrative difficulty in the two fora due to court congestion, the local interest in deciding local controversies at home, and any relevant public policies of the fora. *Id.* at *3.

Finally, while the plaintiff's choice of forum is a "paramount consideration" that "should not be lightly disturbed", the weaker the connection between the selected forum and either the plaintiff or the subject matter of the lawsuit, the easier it is for the defendant to show the requisite inconvenience that will tip the balance of convenience in favor of transfer. *See Affymetrix Inc.*, 28 F.Supp.2d at 198-199.

B. The Convenience of the Parties Favors Transfer

None of the relevant documents or likely party witnesses is in Delaware. In stark contrast, most of the business involving the accused products is transacted in the Eastern District of Michigan, and this is where the relevant documents and most of the party witnesses are located as well. (*See* Tab D at ¶¶ 3-10; Tab E at ¶¶ 2-7).

Notably, this is not a case where defendants are merely seeking to shift the inconveniences. Although it is a Delaware corporation, ATI's connection with this forum ends there. ATI's connection with the Eastern District of Michigan is far more

substantial. For instance, because Detroit is the hub of the U.S. auto industry, ATI's representatives certainly travel to the Eastern District of Michigan on a frequent basis. In addition, during 1999-2004, ATI filed no less than five patent infringement lawsuits in the Eastern District of Michigan, including one against defendant GM. (Tab G). By comparison, the current case is the only case that ATI has ever filed in the District of Delaware. ATI's litigation history confirms that ATI does not consider the Eastern District of Michigan to be inconvenient.

C. The Convenience of the Third-Party Witnesses Favors Transfer

The convenience of third-party witnesses is one of the most significant factors in determining whether a case should be transferred. *Nilssen v. OSRAM Sylvania, Inc.*, No. 00-695-JJF, 2001 WL 34368395, at *2 (D. Del. May 1, 2001) (Farnan, J.). “‘Convenience of the witnesses’ is a phrase encompassing both the geographic location of the witnesses relative to the forum and an ‘interest of justice’ consideration,” *i.e.*, whether the witnesses are subject to compulsory process in either of the competing fora. *Sherwood Medical Co. v. IVAC Medical Sys., Inc.*, No. 96-305-MMS, 1996 U.S. Dist. LEXIS 18194, at *10 (D. Del. Nov. 25, 1996) (Schwartz, J.).

In the present case, none of the material third-party witnesses is presently believed to be located in Delaware, and, therefore, they are not subject to compulsory process here. By comparison, many of the likely third-party witnesses are located in and around the Eastern District of Michigan. Several are subject to compulsory process there. And, with respect to those witnesses who are not subject to compulsory process, the relative convenience of the Eastern District of Michigan could very well play a role in securing their voluntary attendance at trial. Thus, this factor weighs very heavily in favor

of transfer. *See Nilssen*, 2001 WL 34368395 at *3 (noting that video-taped depositions are not an adequate substitute for live testimony when conducting a transfer analysis).

Three of the eight named inventors – Morin, Xu, and Varga – reside in the Eastern District of Michigan.⁵ (Tab H). Accordingly, they are subject to compulsory process in the Eastern District of Michigan. *See 3Com*, 2003 U.S. Dist. LEXIS 7120, at *6 (granting motion to transfer where one of the named inventors resided in the transferee district); *Sherwood*, 1996 U.S. Dist LEXIS 18194, at *4 (granting motion to transfer where three named inventors resided in transferee forum). Not only are they subject to compulsory process there, but also the Eastern District of Michigan is undoubtedly more convenient for these third-party witnesses. *See 3Com*, 2003 U.S. Dist. LEXIS at *6 (it is relatively more convenient for witnesses to travel to a court in the state of their residence or employment).

With respect to the four third-party inventors who are not subject to compulsory process, the Eastern District of Michigan is a more convenient forum for at least three of them. Inventors Chen, Duvall, and Johnson reside closer to the Eastern District of Michigan than they do to the District of Delaware. Chen lives in Windsor, Ontario – less than ten miles from the courthouse in the Eastern District of Michigan. Duvall lives in Reed Springs, Missouri. And Johnson lives in Chowchilla, California. (Tab H).⁶

The relative driving distances for the third-party, inventor witnesses are set forth below:

⁵ There are total of eight different named inventors on the twelve patents in suit. With the exception of David Breed (who is also the President of plaintiff ATI), seven of the named inventors are believed to be non-party witnesses.

⁶ The remaining named inventor, Kussul, apparently resides in Kiev, Ukraine. (Tab H). Presumably, both the Eastern District of Michigan and this district are inconvenient for him.

Name and address	Distance from Delaware Court	Distance from E. District MI Court (Detroit)
Jeffrey L. Morin 911 Saint Johns Blvd. Lincoln Park, MI 48146	565.04	12.79 miles
Kunhong Xu 2792 Broadmoor Dr. Rochester Hills, MI 48309	604.43 miles	29.40 miles
Andrew J. Varga 29292 Marvin Road Farmington Hills, MI 48331	588.87 miles	24.95 miles
Tie-Qi chen Cousineau Road Windsor, ON N9H CANADA	580.75 miles	9.73 miles
Wilbur Duvall Reed Springs, MO	1134.31 miles	804.83 miles
Wendell C. Johnson 210 Riverside Ave. Chowchilla, CA 93610	2867.80 miles	2443.01 miles
Michael E. Kussul Kiev (Kyiv), Ukraine	4780 miles (from escapeartist.com)	4891 miles (from escapeartist.com)

(Tab I).

Other likely third-party witnesses also reside in the Eastern District of Michigan, and, therefore, are subject to compulsory process there. For example, as presently advised, Autoliv, Inc. is a licensee under at least some of the patents in suit. Autoliv is a Swedish company with a North American Headquarters in the Eastern District of Michigan, at Auburn Hills, Michigan. (Tab J). The Autoliv witnesses are material on the issue of a reasonable royalty. *See Nilssen*, 2001 WL 34368395 at *3 (licensee of patents in suit will provide relevant testimony about a reasonable royalty).

Finally, the accused products used in GM vehicles are sold by Elesys to third-party seat manufacturers who integrate the accused products into vehicle seats for GM. These seat manufacturers have offices in the Eastern District of Michigan from which

they transact business concerning the accused products with Elesys and GM. (Tab D, ¶¶ 8-9). To the extent there are material witnesses from these seat manufacturers, they are also subject to compulsory process in the Eastern District of Michigan. *See Sherwood*, 1996 U.S. Dist. LEXIS 18194, at *5 (two outside contractors resided in transferee court).⁷

In summary, the convenience of the witnesses undoubtedly weighs very strongly in favor of transfer to the Eastern District of Michigan.

D. The Location of Books and Records Favors Transfer

Numerous design, development, manufacturing, calibration, sales and financial documents are located within the Eastern District of Michigan, at the facilities of GM and Elesys. (*See* Tab D, ¶ 6; and Tab E, ¶ 6). In contrast, no significant documents are believed to be located in Delaware. *See Sherwood*, 1996 U.S. Dist. LEXIS 18194 at *10 (although plaintiff would have to transfer its documents to whichever forum is chosen, the transferee forum has a “slight edge” because defendant’s records are located there). Accordingly, this factor favors transfer.

E. The Public Interest Factors Favor Transfer

In the present case, three of the public interest factors are essentially neutral and thus do not tip the scales one way or the other; namely, the enforceability of the

⁷ Similarly, the accused products used in Honda vehicles are sold by Elesys to third-party seat manufacturers who integrate the accused products into vehicle seats for Honda. These seat manufacturers have offices and facilities in Ontario, Canada, Ohio, and Alabama. (Tab D, ¶ 12). All of these offices and facilities are closer to the Eastern District of Michigan than they are to the District of Delaware. (Tab K).

judgment, relevant public policies and the comparative docket congestion of the two fora.⁸ However, the two remaining public interest factors favor transfer.

1. Practical Considerations Making Trial Easier, Expeditious, or Less Expensive Favor Transfer

The trial of this matter in the Eastern District of Michigan will be less expensive and more expeditious than if this case remains in this forum. Defendants have identified many party and non-party witnesses who are located in and around the Eastern District Michigan. The cost (both travel and lodging) of obtaining the attendance of these witnesses would be substantially less than if these witnesses were required to travel to the District of Delaware. Moreover, because of their closer proximity to the court in the Eastern District of Michigan, their travel times will be less. Also, these witnesses will be available on shorter notice, which will greatly simplify the logistics of coordinating the sequence and timing of these witnesses at trial.

In addition, the Eastern District of Michigan is familiar with ATI and has relevant experience with at least one of the patents in suit. As mentioned above, ATI has filed five patent infringement cases in the Eastern District of Michigan. One of those cases, *Automotive Technologies Int'l, Inc. v. Delphi Corp.*, No. 03-CV-71368 (E.D. Mich. filed Apr. 4, 2003), involved ATI's assertion of U.S. Patent No. 6,442,504 ("the '504 patent). (Tab G). The '504 patent is a parent to ATI's U.S. Patent No. 6,958,451, which is currently at issue in this case. (Tab M). The '504 patent and the '451 patent have similar disclosures and the Eastern District of Michigan has previous experience construing

⁸ The time from filing to trial in Delaware is approximately 23.5 months. It is slightly less in the Eastern District of Michigan, 22 months. In addition, the weighted filings per judge are 422 and 431, respectively, in the District of Delaware and the Eastern District of Michigan. (Tab L).

claim language in the '504 patent that is identical to some of the limitations, and similar to others, found in the '451 patent.⁹ This is another factor favoring transfer. *See Brunswick Corp. v. Precor Inc.*, No. 00-691-GMS, 2000 U.S. Dist. LEXIS 22222, at *2-3, 8 (D. Del. Dec. 12, 2000) (case transferred to forum where pending litigation involved a parent to the patent in suit).¹⁰

2. Local Interest in Deciding Local Disputes Favors Transfer

The citizens of the Eastern District of Michigan have a strong local interest in resolving this controversy due to the nature of this dispute and the location of the parties. This dispute involves the U.S. auto industry, which is centered in Detroit. It involves that industry's largest player, GM, and another significant player, Honda. *See IKOS Sys., Inc. v. Cadence Design Sys., Inc.*, 2002 U.S. Dist. LEXIS 20574 at *5 (D. Del. Oct. 21, 2002). (in granting motion to transfer to the Northern District of California, this Court noted that "while patent disputes are often not properly characterized as 'local' in nature or otherwise unique to a particular locale [citation omitted]", one factor favoring transfer was that the relevant industry, the Electric Design Automotive Industry, "is apparently located in Silicon Valley.").

In addition, GM is headquartered in Detroit and employs thousands of individuals in and around the Detroit area. Most of the business concerning the accused products is transacted in the Eastern District of Michigan. Thus, the complained of conduct has occurred primarily in the Eastern District of Michigan. *See Arrow Comm. Labs., Inc. v. John Mezzalingua Assocs.*, No. 05-357-SLR, 2005 WL 2786691, *3 (D. Del. Oct. 26,

⁹ The *Delphi* case is currently on appeal.

¹⁰ With the exception of U.S. Pat. No. 6,484,080, the remaining patents asserted by ATI in this case all have some familial relationship in common with the '504 patent.

2005) (noting that most of the alleged infringement occurred in the transferee forum where the accused products were developed, manufactured and sold) (Robinson, J.).

There is no corresponding local interest in Delaware. As a result, this factor also weighs heavily in favor of transferring this case to the Eastern District of Michigan.

F. This Action Could Have Been Brought in the Eastern District of Michigan

28 U.S.C. § 1404(a) allows transfer of a case to a district in which the lawsuit “might have been brought.” A federal district court is a forum in which a lawsuit might be brought if both jurisdictional and venue requirements for the defendants are satisfied. *LG Electronics Inc. v. First Int’l Computer*, 138 F. Supp. 2d 574, 586 (D.N.J. 2001).

1. Venue

In patent cases, venue is governed by 28 U.S.C. § 1400(b), which states that “[a]ny civil action for patent infringement may be brought in the judicial district where the defendant resides” Because all three of the defendants in this case reside within the Eastern District of Michigan, venue is proper there.

The residence of a corporation for the purposes of 28 U.S.C. § 1400(b) is defined by 28 U.S.C. § 1391(c). The relevant portion of that statute states:

In a State which has more than one judicial district and in which a defendant that is a corporation is subject to personal jurisdiction at the time an action is commenced, such corporation shall be deemed to reside in any district in that State within which its contacts would be sufficient to subject it to personal jurisdiction if that district were a separate State.

28 U.S.C. § 1391(c).

In Michigan, a court may exercise limited personal jurisdiction over a defendant if two conditions are met: 1) if the defendant’s conduct falls within a provision of Michigan’s long-arm statutes; and 2) if the exercise of jurisdiction comports with due

process. *Green v. Wilson*, 455 Mich. 342, 350-51, 565 N.W.2d 813, 816-17 (1997). It is beyond question that each of the defendants is subject to personal jurisdiction under several prongs of the Michigan long-arm statute. See M.C.L. § 600.715. To begin with, all of the defendants transact business within the Eastern District of Michigan. See M.C.L. § 600.715(1). In addition, defendants' activities in the Eastern District of Michigan have resulted in ATI's allegations of a tort, i.e., patent infringement, thus bringing the defendants' acts within the second Michigan long-arm provision. See M.C.L. § 600.715(2). Finally, each defendant owns, uses, or possesses real or tangible property situated within the Eastern District of Michigan. See M.C.L. § 600.715(3). Thus, any of the foregoing activities, taken alone, is sufficient to subject the defendants to personal jurisdiction in the Eastern District of Michigan under the Michigan long-arm statute.

The second part of the personal jurisdiction analysis addressed in 28 U.S.C. § 1391(c) focuses on whether each defendant has purposefully established "minimum contacts" with the Eastern District of Michigan such that it would not offend "traditional notions of fair play and substantial justice" to pull defendants into court there. *Electronics for Imaging, Inc. v. Coyle*, 340 F.3d 1344, 1349-50 (Fed. Cir. 2003) (quoting *Int'l Shoe Co. v. Washington*, 326 U.S. 310, 316 (1945)).

"Minimum contacts" exist when a defendant's contacts are "continuous and systematic (i.e., general jurisdiction). See *Red Wing Shoe Co. v. Hockerson-Halberstadt, Inc.*, 148 F.3d 1355, 1359 (Fed. Cir. 1998). Alternatively, "minimum contacts" are found if (1) the defendant purposefully directed its activities at residents of the forum state; (2) the claim arises out of or relates to the defendant's activities with the forum state; and

(3) assertion of personal jurisdiction is reasonable and fair (*i.e.*, specific jurisdiction). *Silent Drive, Inc. v. Strong Inds., Inc.*, 326 F.3d 1194, 1201-1202 (Fed. Cir. 2003) (citations omitted). There is no question that each of the defendants has “minimum contacts” with the Eastern District of Michigan.

a. GM

GM’s world headquarters is in the Eastern District of Michigan, specifically in Detroit. It is unassailable that venue is proper within the Eastern District of Michigan as to GM.

b. Elesys and Honda

Elesys likewise has minimum contacts with the Eastern District of Michigan. It has an office in the Eastern District of Michigan from which it transacts substantial business with respect to the accused products. ATI’s claims against Elesys clearly relate to this activity. Honda likewise has minimum contacts with the Eastern District of Michigan. Honda and its subsidiaries have offices there, and Honda vehicles containing the accused product are sold in the Eastern District of Michigan. (Tab F, ¶ 3). It would be reasonable and fair for the Eastern District of Michigan to extend jurisdiction over Elesys and Honda in connection with ATI’s allegations of patent infringement.

2. Jurisdiction

Because the factual and legal analysis substantially overlap, personal jurisdiction is appropriate over GM, Honda and Elesys in Michigan for at least the reasons venue is proper in the Eastern District of Michigan.

CONCLUSION

The “balance of convenience” strongly favors transferring this case to the Eastern District of Michigan. This case could have been, and should have been, brought in the Eastern District of Michigan in the first instance.

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June 7, 2006
523716

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2006, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

Richard K. Herrmann, Esquire
MORRIS, JAMES, HITCHENS & WILLIAMS LLP

Additionally, I hereby certify that true and correct copies of the foregoing were caused to be served on June 7, 2006 upon the following individuals in the manner indicated:

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EXHIBIT A

D&B Business Information Report

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ATTN: jjackson@brinkshofer.com

Report Printed: MAR 27 2006
In Date

BUSINESS SUMMARY

AUTOMOTIVE TECHNOLOGIES INTERNATIONAL, INC

ATI
2740 Auburn Rd
Auburn Hills, MI 48326

This is a **headquarters** location.
Branch(es) or division(s) exist.

D-U-N-S Number: 60-385-4555

Mailing address: PO Box 8
Denville, NJ 07834

D&B Rating: **1R3**
Number of employees: 1R is **10 or more**
employees.

Web site: www.ati-i.com

Composite credit appraisal: 3 is **fair**.

Telephone: 248 852-6944

D&B PAYDEX®:

Chief executive: DAVID BREED, CHAIRMAN

12-Month D&B PAYDEX: 73
When weighted by dollar amount, payments to
suppliers average 11 days beyond terms.

Year started: 1988

Employs: 10 (9 here)

Based on trade collected over last 12 months.

History: CLEAR
SIC: 8731

Line of business: Commercial physical research

SUMMARY ANALYSIS

D&B Rating: **1R3**
Number of employees: 1R indicates **10 or more** employees.
Composite credit appraisal: 3 is **fair**.

The 1R and 2R ratings categories reflect company size based on the total number of employees for the business. They are assigned to business files that do not contain a current financial statement. In 1R and 2R Ratings, the 2, 3, or 4 creditworthiness indicator is based on analysis by D&B of public filings, trade payments, business age and other important factors. 2 is the highest Composite Credit Appraisal a company not supplying D&B with current financial information can receive. For more information, see the D&B Rating Key.

Below is an overview of the company's rating history since 01/01/91:

D&B Rating	Date Applied
1R3	08/27/04
1R2	06/28/03
--	08/03/01
1R3	05/12/98
2R3	09/05/97
--	08/07/91
BB2	01/01/91

The Summary Analysis section reflects information in D&B's file as of March 27, 2006.

CUSTOMER SERVICE

If you have questions about this report, please call our Customer Resource Center at 1.800.234.3867 from anywhere within the U.S. If you are outside the U.S. contact your local D&B office.

*** Additional Decision Support Available ***

Additional D&B products, monitoring services and specialized investigations are available to help you evaluate this company or its industry. Call Dun & Bradstreet's Customer Resource Center at 1.800.234.3867 from anywhere within the U.S. or visit our website at www.dnb.com.

HISTORY

The following information was reported **12/23/2005**:

Officer(s): DAVID BREED, CHAIRMAN

DIRECTOR(S): The officers identified by (+) and Rino Castelli and Warren Van Genderen.

Business started 1988 by the officers. Relocated Jul 1993 from Mountain Lakes, NJ. David Breed, CHM, owns the majority of the stock. The remainder is owned by employees, consultants and outside stockholders. No one individual with the exception of David Breed owns 20% or more.

DAVID BREED born 1938. Graduated Columbia University, New York, NY PhD, 1966. OCCUPATIONAL BACKGROUND: 1965-66 attended Columbia University, New York, NY. 1966-87 vice president of Breed Corporation, Boonton, NJ. 1987-88 president of Breed Automotive, Boonton, NJ. 1988-present active here.

Business address has changed from 2910 Waterview Dr, Rochester Hills, MI, 48309 to 2365 Avon Industrial Dr, Rochester Hills, MI, 48309.

Business address has changed from 2365 Avon Industrial Dr, Rochester Hills, MI, 48309 to 2740 Auburn Rd, Auburn Hills, MI, 48326.

CORPORATE FAMILY

Click below to buy a Business Information Report on that family member.
For an expanded, more current corporate family view, use D&B's Global Family Linkage product.

Branches (US):

Automotive Technologies International, Inc Romeo, MI
Automotive Technologies International, Inc Boonton, NJ

DUNS # 83-562-3054
DUNS # 96-194-6019

OPERATIONS

12/23/2005

Description: Automotive safety research and development.

Has 3 account(s). Sells to manufacturers.

Nonseasonal.

Employees: 10 which includes officer(s) and 5 part-time. 9 employed here.

Facilities: Leases 8,000 sq. ft. in brick building.

Branches: The company maintains a branch location in Boonton, NJ.

SIC & NAICS

SIC:

Based on information in our file, D&B has assigned this company an extended 8-digit SIC. D&B's use of 8-digit SICs enables us to be more specific to a company's operations than if we use the standard 4-digit code.

NAICS:

541710 Research and Development in the Physical, Engineering, and Life Scienceses

The 4-digit SIC numbers link to the description on the Occupational Safety & Health Administration (OSHA) Web site. Links open in a new browser window.

87310204 Engineering laboratory, except testing

D&B PAYDEX

The D&B PAYDEX is a unique, dollar weighted indicator of payment performance based on up to 10 payment experiences as reported to D&B by trade references.

3-Month D&B PAYDEX: 80

When weighted by dollar amount, payments to suppliers average within terms.

Based on trade collected over last 3 months.

12-Month D&B PAYDEX: 73

When weighted by dollar amount, payments to suppliers average 11 days beyond terms.

Based on trade collected over last 12 months.

When dollar amounts are not considered, then approximately 84% of the company's payments are within terms.

PAYMENT SUMMARY

The Payment Summary section reflects payment information in D&B's file as of the date of this report.

Below is an overview of the company's dollar-weighted payments, segmented by its suppliers' primary industries:

	Total Rcv'd (#)	Total Dollar Amts (\$)	Largest High Credit (\$)	Within Terms (%)	Days Slow			
					<31	31-60	61-90	90>
							(%)	
Top industries:								
Air courier service	2	750	500	34	33	33	-	-
Telephone communictns	1	750	750	100	-	-	-	-
Management services	1	250	250	100	-	-	-	-
Nonclassified	1	250	250	100	-	-	-	-
Short-trm busn credit	1	100	100	100	-	-	-	-
Data processing svcs	1	100	100	100	-	-	-	-
Radiotelephone commun	1	0	0	-	-	-	-	-
Other payment categories:								
Cash experiences	0	0	0					
Payment record unknown	2	300	250					
Unfavorable comments	0	0	0					
Placed for collections:								
With D&B	0	0						
Other	0	N/A						
Total in D&B's file	10	2,500	750					

The highest **Now Owes** on file is \$250

The highest **Past Due** on file is \$250

D&B receives over 600 million payment experiences each year. We enter these new and updated experiences into D&B Reports as this information is received.

PAYMENT DETAILS

Detailed Payment History

Date Reported (mm/yy)	Paying Record	High Credit (\$)	Now Owes (\$)	Past Due (\$)	Selling Terms	Last Sale Within (months)
-----------------------	---------------	------------------	---------------	---------------	---------------	---------------------------

03/06	Ppt	250	250	0		1 mo
02/06	Ppt	100	100	0		1 mo
	Ppt	100	100	0		1 mo
12/05	Ppt	250	100	0		1 mo
10/05	(005)	250	250	250	N30	1 mo
08/05	Ppt	0	0	0		2-3 mos
12/04	Ppt	750	0	0		6-12 mos
	Ppt-Slow 60	500	0	0		4-5 mos
	Slow 30	250	250	250		1 mo
11/04	(010)	50	0	0	N30	6-12 mos

Payments Detail Key: red = 30 or more days beyond terms

Payment experiences reflect how bills are met in relation to the terms granted. In some instances payment beyond terms can be the result of disputes over merchandise, skipped invoices etc.

Each experience shown is from a separate supplier. Updated trade experiences replace those previously reported.

FINANCE

12/23/2005

Repeated attempts to contact business were unsuccessful.

PUBLIC FILINGS

The following Public Filing data is for information purposes only and is not the official record. Certified copies can only be obtained from the official source.

SUITS

Status: Pending
CASE NO.: 04056984CK
Plaintiff: BOHDANA P URBANOVYCH
Defendant: AUTOMOTIVE TECHNOLOGIES INTERNATIONAL INCORPORATED, ROMEO, MI AND OTHERS
Where filed: OAKLAND COUNTY CIRCUIT COURT, PONTIAC, MI
Date status attained: 03/18/2004
Date filed: 03/18/2004
Latest Info Received: 03/31/2004

Status: Dismissed
CASE NO.: 98002826CK
Plaintiff: 10000 - ANDREW VARGA
Defendant: AUTOMOTIVE TECHNOLOGIES INTERNATIONAL INC
Where filed: OAKLAND COUNTY CIRCUIT COURT, PONTIAC, MI
Date status attained: 06/01/1999
Date filed: 01/06/1998
Latest Info Received: 10/23/2001

If it is indicated that there are defendants other than the report subject, the lawsuit may be an action to clear title to property and does not necessarily imply a claim for money against the subject.

The public record items contained in this report may have been paid, terminated, vacated or released prior to the date this report was printed.

GOVERNMENT ACTIVITY

Activity summary

Borrower (Dir/Guar):	NO
Administrative debt:	NO
Contractor:	NO
Grantee:	YES
Party excluded from federal program(s):	NO

Possible candidate for socio-economic program consideration

Labor surplus area:	N/A
Small Business:	YES (2006)
8(A) firm:	N/A

The details provided in the Government Activity section are as reported to Dun & Bradstreet by the federal government and other sources.

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EXHIBIT B

M I C H I G A N

AUTOMOTIVE RESEARCH & DEVELOPMENT DIRECTORY

SECOND EDITION

M I C H I G A N



AUTOMOTIVE RESEARCH & DEVELOPMENT DIRECTORY

SECOND EDITION

CONTACT INFORMATION

The Michigan Automotive Research and Development Directory is now online as a searchable database. This database is continually being updated with new Michigan R&D facilities.

For the complete and most up-to-date searchable database of Michigan's automotive R&D facilities, go to: michigan.org/autotech

UPDATE INFORMATION

This directory contains a listing of companies that have automotive-related research and development (R&D) facilities within the state of Michigan. If you would like to include your company or make changes, please contact Gary Krause at 517.335.0838 or krauseg@michigan.org

Automotive Technologies International, Inc430 South Almont
ph: 810.444.4274

fx: 248.852.7136

Imley City
www.ati-i.com/

48065

PARENT ORGANIZATION	PRINCIPALS	PROFESSIONAL STAFF
	Stu Davis, VP Marketing	Engineers: 9 PhD Scientists: 2 Technician: 1
TOTAL EMPLOYMENT		
14		
AUTOMOTIVE R&D SPENDING		
100%		
ECONOMIC ACTIVITY		
Not Available		
R&D ACTIVITIES	PRODUCTS	
Develop automotive safety systems	Sensors	

FACILITY DESCRIPTION	OTHER SERVICES & ADDITIONAL INFORMATION
Lab and prototype facility	Develop systems in partnership with other companies

05/2005

AVL Powertrain Engineering, Inc47519 Halyard Drive
ph: 734.414.9600

fx: 734.414.9690

Plymouth
www.avl.com/pei

48170

PARENT ORGANIZATION	PRINCIPALS	PROFESSIONAL STAFF
AVL List GMBH	Ray Corbin, President	Development Engineers Software Engineers
TOTAL EMPLOYMENT		
200		
AUTOMOTIVE R&D SPENDING		
Not Available		
ECONOMIC ACTIVITY		
Not Available		
R&D ACTIVITIES	PRODUCTS	
Testing and engineering	Modern gasoline and diesel engines as well as alternatively fueled power plants for a world-wide customer base. Totally new design and development of an engine or engine family and improvement of existing engines	

FACILITY DESCRIPTION	OTHER SERVICES & ADDITIONAL INFORMATION
Complete test cell facility including powertrain validation testing with 20 dispersed test sites including vehicle facilities	Testing

05/2005

AW Transmission Engineering USA, Inc14920 Keel Street
ph: 734.454.1710

fx: 734.454.1091

Plymouth
www.awtec.com

48170

PARENT ORGANIZATION	PRINCIPALS	PROFESSIONAL STAFF
Aisin AW Co, LTD	Not Available	Not Available
TOTAL EMPLOYMENT		
Not Available		
AUTOMOTIVE R&D SPENDING		
Not Available		
ECONOMIC ACTIVITY		
Not Available		
R&D ACTIVITIES	PRODUCTS	
Product engineering, redevelopment and testing	Powertrains	

FACILITY DESCRIPTION	OTHER SERVICES & ADDITIONAL INFORMATION
Not Available	Powertrain re-manufacturing

Web2005

MICHIGAN'S AUTOMOTIVE / VEHICLE RESEARCH AND DEVELOPMENT INDUSTRY continues to grow as one of the world's leading industrial intelligence centers. For example, when this directory was published in 2002, there were fewer than 150 companies listed. Just three years later, we have more than 215 facilities for this second edition of the directory.

For the complete and most up-to-date searchable database of Michigan's automotive R&D facilities, go to:

michigan.org/autotech

For additional printed copies of this directory, comments or additions, contact Gary Krause at 517.335.0838 or krauseg@michigan.org

MICHIGAN ECONOMIC DEVELOPMENT CORPORATIONSM

EXHIBIT C

[Yahoo!](#) [My Yahoo!](#) [Mail](#) [Make Yahoo! your home page](#)[Search the Web](#)[Search](#)**YAHOO! PEOPLE SEARCH****Sign In**New User? [Sign Up](#)[People Search Home](#) - [H](#)**Your People Search:**[Create / Edit My Listing](#) - [Remove My Listi](#)first last city state SPONSOR RESULTS BY INTELIUS ([What's this?](#))

- **David/s. Breed - New Phone Number, Address and Address History Available.** Find Any Unlisted Number and Address with Age, Date of Birth, and Family Members. Search by Maiden name, Spouse Name, Phone Number or Social Security Number.
www.intelius.com

PEOPLE SEARCH RESULTS 1 - 1 out of about 1.

Name

ADVERTISEMENT

Address**Phone****David S Breed**[More Information](#)
[Background Check](#)566 S Beach St
Pentwater, MI
[Add to Address Book, Map](#)

2318692321

Showing 1 - 1 of 1

[First](#) | [Previous](#) | [Next](#) | [Las](#)SPONSOR RESULTS BY INTELIUS ([What's this?](#))

- **Found Current Phone Number and Address for David/s. Breed in Public Records-** Records include Current Address, Phone Number, Age, Date of Birth, Address History and Family Members.
find.intelius.com

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[Privacy Policy](#) - [Terms of Service](#) - [Copyright/IP Policy](#)

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AUTOMOTIVE TECHNOLOGIES
INTERNATIONAL, INC.,
a Delaware corporation,

Plaintiff,

v.

AMERICAN HONDA MOTOR COMPANY,
a California corporation,
ELESYS NORTH AMERICA, INC.,
a Georgia corporation, and
GENERAL MOTORS CORPORATION,
a Delaware corporation,

Defendants.

C.A. No. 06-187-GMS

DECLARATION OF AKIO KOBAYASHI

I, Akio Kobayashi, hereby declare and state based upon my personal knowledge as follows:

1. I am President of Elesys North America, Inc. ("Elesys"). I have held that title since October 1, 2002. I have been employed by Elesys since October 1, 2002, and am familiar with the business practices of Elesys.

2. Elesys designs, develops, manufactures and markets occupant detection systems for automobiles. The Elesys systems are used in conjunction with other vehicle systems to assist in suppressing the deployment of vehicle airbags.

3. Elesys is a Georgia corporation and is headquartered in Suwannee, Georgia. Elesys also maintains a Detroit Safety Center located at 44191 Plymouth Oaks Blvd., Suite 1200, Plymouth, MI 48170, which is in the Eastern District of Michigan.

4. I understand that this lawsuit relates to the Elesys occupant detection systems sometimes known as the "Passenger Sensing System" ("the PSS product") and the "Occupant Detection System" ("the ODS product"). The PSS product and the ODS product are collectively referred to as "the accused products."

5. While the accused products are not manufactured in Michigan, substantial engineering, development, testing and calibration activities concerning the accused products are conducted at Elesys's Detroit Safety Center in Plymouth, Michigan. In addition, most of the marketing and sales activities with respect to the accused products are conducted from Elesys's Detroit Safety Center.

6. The original documents concerning Elesys's development, testing, calibration, marketing and sales of the accused products are located at Elesys's Detroit Safety Center. The Elesys employees who are the most familiar with these activities work from Elesys's Detroit Safety Center, and live in the Detroit area. These employees include, for example:

Susan McCarthy – Elesys VP of Sales and Marketing;

Esther Anderson – Systems Engineer; and

Monir Ahmad – Senior Electrical Engineer

7. General Motors Corporation ("GM") is a customer of Elesys in connection with the PSS product. Elesys has numerous written contracts with GM concerning the PSS product. These contracts contain a choice of law provision identifying Michigan law.

8. With respect to the PSS product, Elesys has designated a third-party located in Jasper, Indiana to manufacture the electronic control units ("ECUs") and another third-party located in Mexico to manufacture the sensor assemblies. The ECUs

and sensor assemblies for the PSS product are shipped to one of three third-party seat manufacturers designated by GM. These third-party seat manufacturers incorporate the PSS product into vehicle passenger seats that they supply GM.

9. These three seat manufacturers are: Faurecia Automotive Seating (“Faurecia”), Intier Automotive (“Intier”), and Lear Corporation (“Lear”). Faurecia, Intier and Lear all have facilities in the vicinity of the particular GM assembly plant they supply. Faurecia’s facility is in Riverside, Missouri. Intier’s facility is at Lewisburg, Tennessee. Lear’s is at Whitby, Ontario. The PSS product is incorporated into seats at these facilities. In addition, Faurecia, Intier and Lear each have an office in the Eastern District of Michigan from which they transact business with Elesys with respect to the PSS product. Faurecia’s office is located at 2800 Superior Court, Auburn Hills, MI 48326. Intier’s office is at 39600 Lewis Drive, Novi, MI 48377. Lear’s office is at 21557 Telegraph Road, Southfield, MI 48086.

10. Faurecia, Intier and Lear all issue Purchase Orders to Elesys concerning the PSS product. These Purchase Orders all contain a choice of law provision that identifies Michigan law. In addition, the Purchase Orders issued by Lear contain an arbitration clause that states that arbitration resulting from any dispute with respect to the Purchase Orders shall take place in Detroit, Michigan.

11. Honda is a customer of Elesys in connection with the ODS product. Elesys manufactures the ECUs for the ODS product in Suwannee, Georgia. The sensor assemblies for the ODS are manufactured by a third-party located in Japan designated by Honda. The ECUs and sensor assemblies are shipped to one of two third-party seat

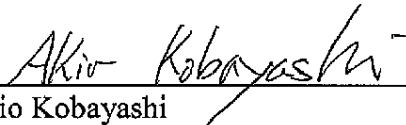
manufacturers designated by Honda. The third-party seat manufacturers incorporate the ECUs and sensor assemblies for the ODS into passenger seats that they supply Honda.

12. The seat manufacturers designated by Honda are: Setex and TS Tech North America. Setex and TS Tech, respectively, have facilities in the vicinity of the particular Honda assembly plants they supply. Setex's facilities are located at St. Marys, Ohio; Eastaboga, Alabama; and Shelburne, Ontario. TS Tech's facilities are located at Reynoldsburg, Ohio; Boaz, Alabama; and New Market, Ontario. The ODS product is incorporated into the seats at these facilities.

13. Elesys has not sold the accused products in Delaware. Elesys has no offices in Delaware. Elesys does not have any officers or employees located in Delaware.

14. I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 25 day of May, 2006



Akio Kobayashi

EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AUTOMOTIVE TECHNOLOGIES
INTERNATIONAL, INC.,
a Delaware corporation,

Plaintiff,

v.

AMERICAN HONDA MOTOR COMPANY,
a California corporation,
ELESYS NORTH AMERICA, INC.,
a Georgia corporation, and
GENERAL MOTORS CORPORATION,
a Delaware corporation,

Defendants.

C.A. No. 06-187-GMS

DECLARATION OF GALEN E. RESSLER

I, Galen E. Ressler, hereby declare and state based upon my personal knowledge as follows:

1. I am an Engineering Specialist – Airbag Suppression Systems Lead Engineer at General Motors Corporation (“GM”). I have held that position since 1997. I have been employed by GM since 1984, and am familiar with the business practices of GM.

2. GM is the world’s largest automaker. GM is a Delaware corporation with its global headquarters in Detroit Michigan, and its technical, design and R&D facility in Warren, Michigan. Both Detroit and Warren are in the Eastern District of Michigan.

3. I understand that this lawsuit involves, among other things, the “Passenger Sensing System” (“the PSS product”), which GM purchases from Elcsys North America,

Inc. ("Elesys"). The PSS product is incorporated into certain vehicle models manufactured by GM. The PSS product assists in the control of airbag deployment.

4. GM transacts substantially all of its business with respect to the PSS product through its Michigan facilities. GM's purchasing decisions regarding the PSS product are made in Warren, as are GM's engineering and development activities concerning the PSS product. No product development or engineering with regarding to the PSS product is done in Delaware.

5. GM's potential witnesses concerning the PSS product and its use and implementation in GM vehicles are also located in the Eastern District of Michigan. In addition to me, these witnesses include, for example, Romeo Garcia (Lead Engineer), Karen Morley (Lead Engineer), Joe Gleason (Performance Engineer), Tim Hill (Sensing Performance Engineer), and Tona Gipson (Global Purchasing -- Global CT Leader).

6. The original documents concerning GM's business and technical activities with respect to the PSS product are located in the Eastern District of Michigan.

7. I am informed that the applicable law for GM's written contracts with Elesys concerning the PSS product have Michigan as the choice of law.

8. I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 6th day of June, 2006


Galen E. Ressler

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

**AUTOMOTIVE TECHNOLOGIES
INTERNATIONAL, INC.,**
a Delaware corporation,

Plaintiff,

V.

AMERICAN HONDA MOTOR COMPANY,
a California corporation,
ELESYS NORTH AMERICA, INC.,
a Georgia corporation, and
GENERAL MOTORS CORPORATION,
a Delaware corporation,

Defendants.

C.A. No. 06-187-GMS

DECLARATION OF DANIEL K. BONAWITZ

I, Daniel K. Bonawitz, hereby declare and state based upon my personal knowledge, information or belief, as follows:

1. I am Vice President of Auto Operations at American Honda Motor Co., Inc. ("American Honda"). I have held that title since 1998. I have been employed by American Honda since 1985, and am familiar with the business practices of American Honda.

2. American Honda is a California corporation with a principal place of business in Torrance, California. American Honda and its affiliated companies maintain multiple offices in the Eastern District of Michigan. Specifically, American Honda maintains an office in Ann Arbor, Michigan. Honda North America, Inc. maintains an office in Detroit, Michigan. And, Honda R&D Americas, Inc., maintains an office in Southfield, Michigan.

3. On information and belief, I understand that this lawsuit involves, among other things, the occupant detection system ("ODS") and occupant positioning detection system ("OPDS") products that are incorporated into certain vehicle models distributed by American Honda. The ODS and OPDS products assist in the control of specified airbag deployment. American Honda's manufacturing affiliates obtain the electronic control units for the ODS and OPDS from Elesys North America, Inc. ("Elesys"). American Honda's manufacturing affiliates obtain the other components for the ODS and OPDS products from third-parties not affiliated with Elesys. American Honda sells vehicles containing the ODS or the OPDS products in the Eastern District of Michigan, as well as elsewhere throughout the United States.

4. The development and testing of the ODS and the OPDS products for Honda vehicles is conducted by American Honda's affiliate, Honda R&D America's, Inc. at its facility in Raymond, Ohio.

5. On information and belief, the original documents concerning Honda's development and testing work with respect to the ODS and OPDS products are located in Raymond, Ohio. One of the more knowledgeable persons concerning this development and testing activity, as well as the manner in which the ODS and OPDS systems are implemented in Honda vehicles, is Chris Hinninger. Mr. Hinninger resides at 5942 McIntyre Drive, Dublin, Ohio 43016.

6. Honda's only physical presence in Delaware is the maintenance of a small office by a Honda affiliate, American Honda Finance Corporation.

7. I hereby declare under the penalty of perjury under the laws of the United States that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true.

Executed this 5th day of June, 2006

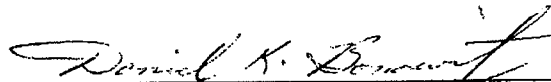

Daniel K. Bonawitz
Vice President – Auto Operations
American Honda Motor Co., Inc.

EXHIBIT G

**U.S. District Court
Eastern District of Michigan (Detroit)
CIVIL DOCKET FOR CASE #: 2:99-cv-75651-PDB**

Auto Tech Intl v. Nissan N Amer Inc
Assigned to: Judge Paul D Borman
Demand: \$0

Date Filed: 11/23/1999
Jury Demand: None
Nature of Suit: 830 Patent
Jurisdiction: Federal Question

Plaintiff

**Automotive Technologies
International**

represented by **Andrew Kochanowski**
Sommers, Schwartz,
2000 Town Center
Suite 900
Southfield, MI 48075-1100
248-255-0300
Email:
akochanowski@sommerspc.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

**Nissan North America,
Incorporated**

represented by **Edward C. Cutlip, Jr.**
Kerr, Russell, (Detroit)
500 Woodward Avenue
Suite 2500
Detroit, MI 48226-3406
313-961-0200
Email: ecc@krwlaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Counter Claimant

**Nissan North America,
Incorporated**

represented by **Edward C. Cutlip, Jr.**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Counter Defendant**Automotive Technologies
International**represented by **Andrew Kochanowski**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
11/23/1999	<u>1</u>	COMPLAINT filed - Receipt # 390307 - Date Fee Received: 11/23/99 (lg) (Entered: 11/30/1999)
02/08/2000	<u>2</u>	NOTICE by plaintiff of voluntary dismissal without prejudice with proof of mailing (cm) (Entered: 02/09/2000)
02/24/2000	<u>3</u>	APPEARANCE for defendant of attorney Edward C. Cutlip Jr. with proof of mailing (cm) (Entered: 02/25/2000)
02/24/2000	<u>4</u>	ANSWER by defendant to complaint [1-1] with proof of mailing (cm) (Entered: 02/25/2000)
02/24/2000	<u>4</u>	AFFIRMATIVE defenses by defendant (cm) (Entered: 02/25/2000)
02/24/2000	<u>4</u>	COUNTERCLAIM by Nissan N Amer Inc against Auto Tech Intl (cm) (Entered: 02/25/2000)

**U.S. District Court
Eastern District of Michigan (Detroit)
CIVIL DOCKET FOR CASE #: 2:01-cv-71700-RHC-TAC**

Auto Tech Intl v. BMW N Amer Inc, et al
Assigned to: Judge Robert H Cleland
Referred to: Honorable Thomas A Carlson
Demand: \$75,000
Cause: No cause code entered

Date Filed: 05/02/2001
Jury Demand: Both
Nature of Suit: 830 Patent
Jurisdiction: Federal Question

Plaintiff

**Automotive Technologies
International**

represented by **Andrew Kochanowski**
Sommers, Schwartz,
2000 Town Center
Suite 900
Southfield, MI 48075-1100
248-255-0300
Email:
akochanowski@sommerspc.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

**BMW of North America,
Incorporated**
a Delaware Corporation
TERMINATED: 11/25/2003

represented by **Anthony G. Arnone**
Kitch, Drutchas, (Detroit)
One Woodward Avenue
10th Floor
Detroit, MI 48226-3499
313-965-7900
Fax: 313-965-7461
TERMINATED: 11/25/2003
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Kim J. Sveska
Foley, Baron, (Farmington Hills)
33533 W. Twelve Mile Road
Suite 350
Farmington Hills, MI 48331-5611
248-488-1243
Fax: 248-488-1254

Email: ksveska@fbmlaw.com
TERMINATED: 11/25/2003
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Roger D. Taylor
Finnegan, Henderson,
1300 I Street, N.W.
Washington, DC 20005-3315
202-408-4000
Fax: 202-408-4000
TERMINATED: 11/25/2003
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

William B. Dyer, III
Finnegan, Henderson,
1300 I Street, N.W.
Washington, DC 20005-3315
202-408-4000
Fax: 202-408-4000
TERMINATED: 11/25/2003
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

**Bosch Automotive Motors
System Corporation**
TERMINATED: 12/20/2001

represented by **Jeffrey M. Butler**
Kenyon & Kenyon
One Broadway
New York, NY 10004
212-425-7200
Fax: 212-425-7200
TERMINATED: 12/20/2001
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Marjory G. Basile
150 W. Jefferson
Suite 2500
Detroit, MI 48226-4415
313-963-6420
Email: basile@millercanfield.com
TERMINATED: 12/20/2001
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

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TERMINATED: 12/20/2001
ATTORNEY TO BE NOTICED

Defendant

**DaimlerChrysler Motors
Corporation**
TERMINATED: 04/04/2003

represented by **Boyd T. Cloern**
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TERMINATED: 04/04/2003
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202-912-5000
Fax: 202-912-5000
TERMINATED: 04/04/2003
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

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Fax: 212-878-3140
TERMINATED: 04/04/2003
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Michelle Thurber Czapski
(See above for address)
TERMINATED: 04/04/2003

ATTORNEY TO BE NOTICED

Defendant

DaimlerChrysler Corporation

represented by **Drew M. Wintringham, III**

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Joel N. Bock

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Kathleen A. Lang

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Kenneth A. Gallo

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Leora Ben-Ami

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Boyd T. Cloern

(See above for address)

ATTORNEY TO BE NOTICED

Frank C. Cimino, Jr.

(See above for address)

ATTORNEY TO BE NOTICED

Michelle Thurber Czapski

(See above for address)

ATTORNEY TO BE NOTICED

Defendant

Daimler Chrysler AG

a German Corporation

Doing business as

represented by **Kathleen A. Lang**

(See above for address)

LEAD ATTORNEY

Dodge
Doing business as
Chrysler Motors Corporation
Doing business as
Mercedes-Benz USA,
Incorporated

ATTORNEY TO BE NOTICED

Michelle Thurber Czapski
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

**Denso International America,
Incorporated**
TERMINATED: 11/04/2004

represented by **Drew M. Wintringham, III**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joel N. Bock
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Kathleen A. Lang
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Kenneth A. Gallo
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Leora Ben-Ami
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Boyd T. Cloern
(See above for address)
ATTORNEY TO BE NOTICED

Frank C. Cimino, Jr.
(See above for address)
ATTORNEY TO BE NOTICED

Michelle Thurber Czapski
(See above for address)
ATTORNEY TO BE NOTICED

Defendant

**Denso Manufacturing Michigan,
Incorporated**

TERMINATED: 10/08/2001

represented by **Kathleen A. Lang**

(See above for address)

TERMINATED: 10/08/2001

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Defendant

Ford Motor Company

Doing business as

Jaguar

Doing business as

Lincoln

Doing business as

Mercury

Doing business as

Ford

represented by **Drew M. Wintringham, III**

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Joel N. Bock

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Kathleen A. Lang

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Kenneth A. Gallo

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Leora Ben-Ami

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Boyd T. Cloern

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ATTORNEY TO BE NOTICED

Frank C. Cimino, Jr.

(See above for address)

ATTORNEY TO BE NOTICED

Michelle Thurber Czapski

(See above for address)

ATTORNEY TO BE NOTICED

Defendant

Fuji Heavy Industries, Limited
TERMINATED: 06/02/2005

represented by **Boyd T. Cloern**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Drew M. Wintringham, III
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Frank C. Cimino, Jr.
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Joel N. Bock
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Kenneth A. Gallo
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Leora Ben-Ami
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LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Michelle Thurber Czapski
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Subaru of America,

represented by **Drew M. Wintringham, III**

Incorporated

TERMINATED: 06/02/2005

Doing business as

Subaru

TERMINATED: 06/02/2005

Doing business as

Isuzu Automotive, Incorporated

TERMINATED: 06/02/2005

(See above for address)

LEAD ATTORNEY

ATTORNEY TO BE NOTICED

Joel N. Bock

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Frank C. Cimino, Jr.

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ATTORNEY TO BE NOTICED

Michelle Thurber Czapski

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ATTORNEY TO BE NOTICED

Defendant

General Motors Corporation

Doing business as

Buick

Doing business as

Cadillac Motors

Doing business as

Chevrolet

Doing business as

represented by **Binal Patel**

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LEAD ATTORNEY

GMC Truck and Coach
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Oldsmobile
Doing business as
Pontiac

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Joel N. Bock
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TERMINATED: 09/06/2002
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Boyd T. Cloern
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TERMINATED: 09/06/2002
ATTORNEY TO BE NOTICED

**U.S. District Court
Eastern District of Michigan (Detroit)
CIVIL DOCKET FOR CASE #: 2:02-cv-73572-NGE**

Auto Tech Intl Inc v. TRW Vehicle Safety, et al
Assigned to: Honorable Nancy G Edmunds
Demand: \$0

Date Filed: 09/06/2002
Jury Demand: Plaintiff
Nature of Suit: 830 Patent
Jurisdiction: Federal Question

Plaintiff

**Automotive Technologies
International, Incorporated**

represented by **Andrew Kochanowski**
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Email: baniak@bpqlaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Counter Claimant**TRW Vehicle Safety Systems
Incorporated**represented by **William A. Sankbeil**
(See above for address)
LEAD ATTORNEY
*ATTORNEY TO BE NOTICED***Fred K. Herrmann**
(See above for address)
*ATTORNEY TO BE NOTICED***Frank P. Porcelli**
(See above for address)
ATTORNEY TO BE NOTICED

V.

Counter Defendant**Automotive Technologies
International, Incorporated**represented by **Andrew Kochanowski**
(See above for address)
LEAD ATTORNEY
*ATTORNEY TO BE NOTICED***Jeffrey A. Pine**
(See above for address)
LEAD ATTORNEY
*ATTORNEY TO BE NOTICED***Michael H. Baniak**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
09/06/2002	<u>1</u>	COMPLAINT with jury demand - Receipt # 443816 - Date Fee Received: 09/06/02 (dp) (Entered: 09/10/2002)
12/18/2002	<u>2</u>	SUMMONS returned executed by process server on 12/17/02 - answer due 1/6/03 for TRW Inc (kg) (Entered: 12/18/2002)
01/07/2003	<u>3</u>	ORDER by Judge Nancy G. Edmunds with stipulation, setting deadline for answer to complaint [1-1] for 2/5/03 [EOD Date:

		Thomas on March 16, 2006 REPORT by Automotive Technologies International, Incorporated.(Baniak, Michael) (Entered: 03/23/2006)
03/28/2006	<u>164</u>	POWERPOINT Slides by Automotive Technologies International, Incorporated from 3/16/06 Summary Judgment Hearing... [FILED UNDER SEAL-PLACED IN VAULT](JJoh,) (Entered: 03/28/2006)
03/28/2006	<u>165</u>	EXHIBIT(filed under seal) re <u>122</u> MOTION in Limine to <i>Exclude Evidence Regarding the Alleged Prior Art "Autoliv" and "TRW" Devices</i> by Automotive Technologies International, Incorporated (PPaul,) (Entered: 03/29/2006)
03/28/2006	<u>166</u>	Powerpoint Slides(filed under seal) regarding Motion for Summary Judgment of Non-Infringement by Automotive Technologies International, Incorporated (PPaul,) (Entered: 03/29/2006)
03/28/2006	<u>167</u>	POWERPOINT Slides(filed under seal) regarding Motion for Summary Judgment of Invalidity by Automotive Technologies International, Incorporated (PPaul,) (Entered: 03/29/2006)
03/28/2006	<u>168</u>	POWERPOINT Slides(filed under seal) regarding Motion in Limine to exclude evidence regarding the alleged prior Art "Autoliv" and "TRW" Devices by Automotive Technologies International, Incorporated (PPaul,) (Entered: 03/29/2006)
03/28/2006	<u>169</u>	POWERPOINT Slides(filed under seal) regarding Motion for Summary Judgment of Invalidity by Automotive Technologies International, Incorporated (PPaul,) (Entered: 03/29/2006)
03/28/2006	<u>170</u>	CERTIFICATE OF SERVICE by Automotive Technologies International, Incorporated re <u>168</u> Exhibit, <u>167</u> Exhibit, <u>166</u> Exhibit. (PPaul,) (Entered: 03/29/2006)

**U.S. District Court
Eastern District of Michigan (Detroit)
CIVIL DOCKET FOR CASE #: 2:03-cv-71368-LPZ**

Auto Tech Intl Inc v. Delphi Corp
Assigned to: Judge Lawrence P Zatkoff
Demand: \$0

Date Filed: 04/04/2003
Jury Demand: Plaintiff
Nature of Suit: 830 Patent
Jurisdiction: Federal Question

Plaintiff

**Automotive Technologies
International, Incorporated**

represented by **Andrew Kochanowski**
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LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

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Counter Claimant

Delphi Corporation

represented by **Bradley J. Diedrich**
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LEAD ATTORNEY
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R. Terrance Rader
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V.

Counter Defendant

**Automotive Technologies
International, Incorporated**

represented by **Andrew Kochanowski**
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LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
04/04/2003	<u>1</u>	COMPLAINT; jury demand - Receipt # 485453 - Date Fee Received: 4/04/03 (kb) (Entered: 04/15/2003)
04/09/2003	<u>2</u>	SUMMONS returned executed by process service on 4/8/03 - answer due 4/28/03 for Delphi Corp (kb) (Entered: 04/15/2003)

11/30/2004	<u>83</u>	NOTICE by FC of authorized abbreviated caption re <u>79</u> Federal Circuit Notice of Appeal. (LBeh,) (Entered: 12/02/2004)
07/12/2005	<u>84</u>	NOTICE of Change of Attorney Information by Automotive Technologies International, Incorporated. (Kochanowski, Andrew) (Entered: 07/12/2005)

**U.S. District Court
Eastern District of Michigan (Detroit)
CIVIL DOCKET FOR CASE #: 2:04-cv-72035-RHC-RSW**

Automotive Technologies International,
Incorporated v. Delphi Automotive Systems
Corporation et al
Assigned to: Honorable Robert H Cleland
Referred to: Honorable R. Steven Whalen
Cause: No cause code entered

Date Filed: 04/30/2004
Jury Demand: Plaintiff
Nature of Suit: 830 Patent
Jurisdiction: Federal Question

Plaintiff

**Automotive Technologies
International, Incorporated**
a Delaware Corporation

represented by **Andrew Kochanowski**
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Email: pine@bpglaw.com
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LEAD ATTORNEY
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ATTORNEY TO BE NOTICED

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313-234-7100
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Counter Defendant

**Automotive Technologies
International, Incorporated**
a Delaware Corporation

Counter Claimant

Calsonic Kansei Corporation
a Japanese corporation

V.

Counter Defendant

**Automotive Technologies
International, Incorporated**
a Delaware Corporation

Date Filed	#	Docket Text
04/30/2004	<u>1</u>	COMPLAINT filed by Automotive Technologies International, Incorporated against Calsonic Kansei Corporation, Delphi Automotive Systems Corporation, Denso International America, Incorporated, Siemens VDO Automotive, Incorporated, TK Electronics Incorporated and TRW Automotive Holdings Corporation - Receipt No. 507011.(LBar,) Additional attachment(s) added on 5/3/2004 (LBar,) (Entered: 05/03/2004)
05/04/2004	<u>2</u>	SUMMONS Returned Executed. TRW Automotive Holdings

02/15/2005	<u>42</u>	BRIEF in Support re <u>31</u> Markman Brief,,, <u>32</u> Markman Brief, <u>36</u> Memorandum filed by all plaintiffs. (Attachments: # <u>1</u> Index of Exhibits # <u>2</u> Exhibit D)(Kochanowski, Andrew) (Entered: 02/15/2005)
02/15/2005	<u>43</u>	BRIEF in Support re <u>28</u> Statement,, <u>42</u> Brief in Support of Response <i>regarding claim construction</i> filed by Delphi Automotive Systems Corporation. (Attachments: # <u>1</u> Exhibit Breed deposition transcript excerpt)(Patel, Binal) (Entered: 02/15/2005)
02/15/2005	<u>44</u>	MARKMAN BRIEF by TRW Automotive Holdings Corporation, Siemens VDO Automotive, Incorporated, TRW Automotive Holdings Corporation, TK Electronics, Incorporated, TRW Automotive U. S., L. L. C., Denso International America, Incorporated, Siemens VDO Automotive, Incorporated, TK Electronics, Incorporated. (Attachments: # <u>1</u> Index of Exhibits # <u>2</u> Exhibit #5 and #6# <u>3</u> Document Continuation Certificate of Service)(Lang, Kathleen) (Entered: 02/15/2005)
02/15/2005	<u>45</u>	MEMORANDUM <i>Opposition Brief to ATI's Claim Construction Brief</i> by Calsonic Kansei Corporation.(VanOphem, John) (Entered: 02/15/2005)
02/16/2005	<u>46</u>	EXHIBIT 5 to opposition brief to ATI's claim construction brief by joint defendants, filed by TRW Automotive Holdings Corporation, TRW Automotive U. S., L. L. C.. FILED UNDER SEAL(KGeha,) (Entered: 02/17/2005)
05/10/2005	<u>47</u>	ORDER adjourning Markman Hearing to 9/14/05 at 2:00 pm. Signed by Honorable Robert H Cleland. (LTee,) (Entered: 05/10/2005)
05/12/2005	<u>48</u>	MARKMAN BRIEF by Calsonic Kansei Corporation. (Attachments: # <u>1</u> Exhibit A - case opinion)(VanOphem, John) (Entered: 05/12/2005)
07/12/2005	<u>49</u>	NOTICE of Change of Attorney Information by Automotive Technologies International, Incorporated. (Kochanowski, Andrew) (Entered: 07/12/2005)
09/09/2005	<u>50</u>	STIPULATION AND ORDER staying case. Signed by Honorable Robert H Cleland. (KGeha,) (Entered: 09/12/2005)
10/17/2005	<u>51</u>	NOTICE by Delphi Automotive Systems Corporation of <i>Operation of Automatic Stay</i> (Cosnowski, William) (Entered: 10/17/2005)

EXHIBIT H

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Kunhong Xu

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Rochester Hills, MI
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2483758920

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Phone

Andrew Varga

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[Background Check](#)

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Farmington Hills, MI
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Detailed Information

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691 Cousineau Rd
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Tel.: (519) 250-9879

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PEOPLE SEARCH RESULTS 1 - 1 out of about 1.

Name	ADVERTISEMENT	Address	Phone
<u>Wilbur Duvall</u>	<div> More Information Background Check </div>	Reeds Spring, MO Add to Address Book , Map	4173384957

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SPONSOR RESULTS BY INTELIUS ([What's this?](#))

- **Found Current Phone Number and Address for Wilbur Duvall in Public Records-** Records include Current Address, Phone Number, Age, Date of Birth, Address History and Family Members.
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- **Wendell/c Johnson - New Phone Number, Address and Address History Available.**
Unlisted Number and Address with Age, Date of Birth, and Family Members. Search by Maiden name, Spouse Name or Social Security Number.
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PEOPLE SEARCH RESULTS 1 - 1 out of about 1.

Name

ADVERTISEMENT

Address

Phone

Wendell C Johnson

[More Information](#)
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210 Riverside Ave
Chowchilla, CA
[Add to Address Book](#), [Map](#)

5596651252

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[First](#) | [Previous](#)

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first David last Breed city state New Jersey

SPONSOR RESULTS BY INTELIUS ([What's this?](#))

- **David Breed - New Phone Number, Address and Address History Available.** Find Any Unlisted Number and Address with Age, Date of Birth, and Family Members. Search by Maiden name, Spouse Name, Phone Number or Social Security Number.
[www.intelius.com](#)

PEOPLE SEARCH RESULTS 1 - 1 out of about 1.

Name	ADVERTISEMENT	Address	Phone
<u>David Breed</u>	<div>More Information Background Check</div>	48 Hillcrest Rd Boonton, NJ Add to Address Book , Map	9732638575

Showing 1 - 1 of 1

[First](#) | [Previous](#) | [Next](#) | [Las](#)

SPONSOR RESULTS BY INTELIUS ([What's this?](#))

- **Found Current Phone Number and Address for David Breed in Public Records-** Records include Current Address, Phone Number, Age, Date of Birth, Address History and Family Members.
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Search the Web: David Breed, New Jersey

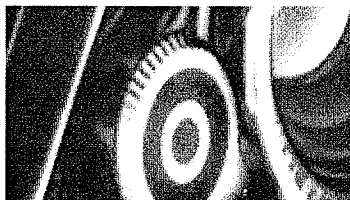
[Advanced Web Search](#)

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NN Neural Network Team

KIEV, UKRAINE

PROJECTS SOFTWARE HARDWARE MEMBERS PARTNERS APPLIES

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e-mail: kussul@nnteam.org.ua

**Skills**

Management: Project manager, Lead Analyst, Head of Neuro-Computing Department

Special: Artificial Neural Networks, Classifiers, Signal processing, Mathematical modeling, Solid state Electronics, Ultrasonic and Optic sensors

Programming Languages/Tools/Frameworks:

C/C++, Visual Studio, Builder C++, Java, FORTRAN, Micro-assembler, PCAD, XACT Step, Viewlogic PRO Series, MathCAD

Software: Microsoft Office (Word, Excel etc.) etc., Team Source

OS/Platforms: DOS, Windows (3.1, 95, 98, 2000, XP), Unix

Hardware: FPGA, PLD, RISC Processors, PIC Processors, Intel x386 and higher

Experience in

- Artificial Neural Networks, Classifiers, Pattern recognition (14 years)
- Data processing (14 years), Mathematical modeling (17 years)
- System programming, Assembler, C/C++ (12 years)
- Hardware design (8 years)
- Solid state electronics/sensors (5 years)

Education

- **PhD** in Engineering (Solid-state Electronics and Microelectronics), Polytechnic Institute of Kiev, Kiev, 1990
- **MS** in Electronics (Dielectrics and Semiconductors), Polytechnic Institute of Kiev, Kiev, 1986
- **BS** in Engineering, Polytechnic Institute of Kiev, Kiev, 1983

Experience

2001 - Present Consultant, International Scientific Research, LLC (Mundelein, IL, USA)

Consulting on Neural networks and Tools development for wide range of recognition tasks. Solutions for smart airbag ultrasonic and optical systems.

- 1998 - 2000 Senior Program Engineer, Automotive Technology International, Inc. (Denville, NJ, USA)**
- Neural network research and comparative analysis of neural network paradigms using theoretical investigation and modeling; Investigation and development neural networks for smart safety system of vehicle; Design and Development Neural Network Tool for wide range of recognition tasks.
- 1992 - Present Senior Scientific Researcher, Institute of Mathematical Machine and Systems (Kiev, Ukraine)**
- Development and investigation of new neural network paradigms as, for example, «Perceptron in Subspaces Classifier». Design and development of software tools and neural network processor hardware. Applying neural networks to power engineering tasks. Carrying-out numerous of neural network government projects as, for example, project of Government Committee of Science, Technique and Manufacturing #6.03.03 "Neuro-Computer".
- 1995 - 1996 Lead Analyst of Ukrainian Team, "S3 Technologies" (Columbia, MD, USA)**
- Technology transfer project of development of the full scope simulator of nuclear power plants. Member of project for the Khmelnitsky nuclear power plant.
- 1992 - 1993 Coordinator of Project, WACOM Co. (Tokyo, Japan)**
- Design and development of the associative projective neural-computer B512M for the wide range of cognition tasks. Pre-production model was done using FPGA of XILINX company.
- 1990 - 1992 Head of Neuro-Computing Department, Informatika (Kiev, Ukraine)**
- Development neural-computers and design preprocessor hardware for the recognition and control tasks. Design and development built-in neural coprocessor for IBM PC compatible computers by request of "Orion" company (Moscow, Russia).
- 1989 - 1990 Lecturer in Physics, Polytechnic Institute of Kiev (Kiev, Ukraine)**
- Development and investigation thin solid sandwich structures ferroelectric semiconductor. Design photoelectric sensors. Development of models and technology of the sensors.
- 1986 - 1989 Graduate Researcher, Polytechnic Institute of Kiev (Kiev, Ukraine)**
- Investigation the resonance ferroelectric sensors. Development and investigation the thin solid films of semiconductor on the ferroelectric.

Publications and Presentations

Scope - more than 40 publications dedicated to signal processing, neural networks theory and applications, pattern recognition and solid-state electronics. The results were discussed on numerous conferences including international conferences IJCNN'02, EUFIT'97, UEES'97, ICIAM'95 etc. Co-author of 8 patents.

Languages: English: good
 Russian and Ukrainian: native

Grants and Awards:

- 1994 - 1996 President of Ukraine Scholarship for Junior Scientists

- 1996 - 1998 President of Ukraine Scholarship for Junior Scientists
- Grant INTAS-93-0560, High Performance Classification Based on Neural Networks with Fast Training
- Grant INTAS-96-2248, Selective three-dimensional electrodeposition of nanophase and amorphous moving microstructures for application in micromachining and microelectromechanical systems.

Completed: June 2005

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Designed by Programmix

EXHIBIT I

(PART 1 OF 5)

















START 911 Saint Johns Blvd
Lincoln Park, MI 48146-
4234, US

END 844 N King St
Wilmington, DE 19801-
3519, US

Total Est. Time:
9 hours, 20 minutes

Total Est. Distance:
565.04 miles

Maneuvers	Distance
 1: Start out going WEST on ST JOHNS BLVD toward FERRIS AVE.	0.1 miles
 2: Turn LEFT onto FERRIS AVE.	<0.1 miles
 3: Turn RIGHT onto CLOVERLAWN BLVD.	0.2 miles
 4: Turn RIGHT onto FORT ST / MI-85 N.	<0.1 miles
 5: Make a U-TURN onto FORT ST / MI-85 S.	0.7 miles
 6: Turn RIGHT onto NORTHLINE RD.	0.6 miles
 7: Turn LEFT onto TOLEDO.	2.6 miles
 8: TOLEDO becomes TOLEDO RD.	1.2 miles
 9: TOLEDO RD becomes DIX TOLEDO HWY.	0.2 miles
 10: Merge onto I-75 S via the ramp on the LEFT toward TOLEDO (Crossing into OHIO).	37.2 miles
 11: Merge onto I-280 S via EXIT 208 on the LEFT toward I-80 / I-90 / TURNPIKE.	12.6 miles
 12: Merge onto I-80 E via EXIT 1A toward CLEVELAND (Portions toll).	146.8 miles
 13: Merge onto I-76 E via the exit on the LEFT (Portions toll) (Crossing into PENNSYLVANIA).	335.8 miles
 14: Take the PA-100 exit- EXIT 312- toward POTTSTOWN / WEST CHESTER.	0.4 miles



15: Merge onto PA-100 S toward
DOWNTOWN.

7.6 miles



16: Take US-202 S (Crossing into
DELAWARE).

16.4 miles



17: US-202 S becomes DE-202 S.

1.2 miles



18: Turn RIGHT onto N MARKET ST / US-13
BR. Continue to follow US-13 BR S.

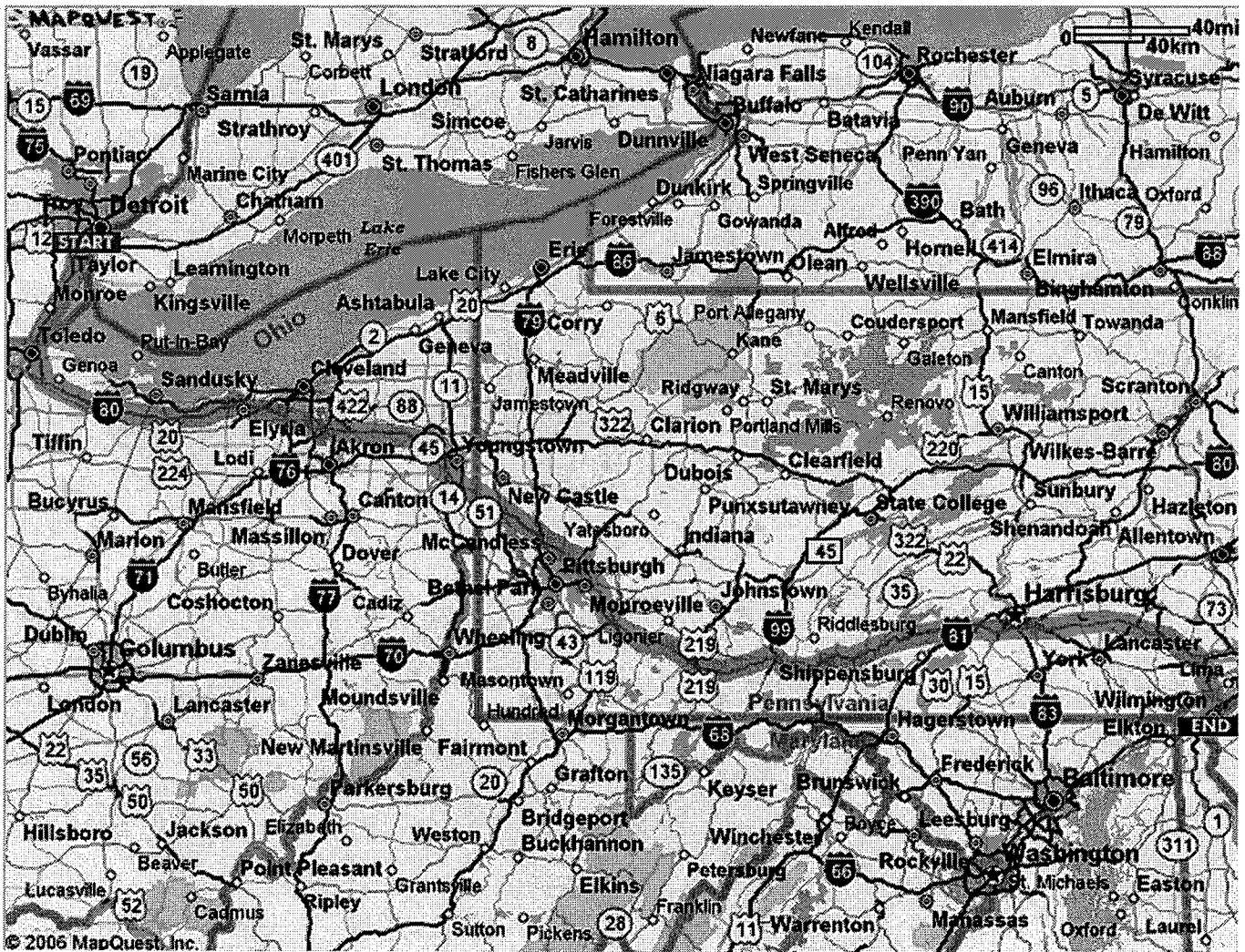
0.7 miles



19: End at **844 N King St**
Wilmington, DE 19801-3519, US

Total Est. Time: 9 hours, 20 minutes
Distance: 565.04 miles

Total Est.



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START 911 Saint Johns Blvd
 Lincoln Park, MI 48146-4234, US

END 231 W Lafayette Blvd
 Detroit, MI 48226-2700, US

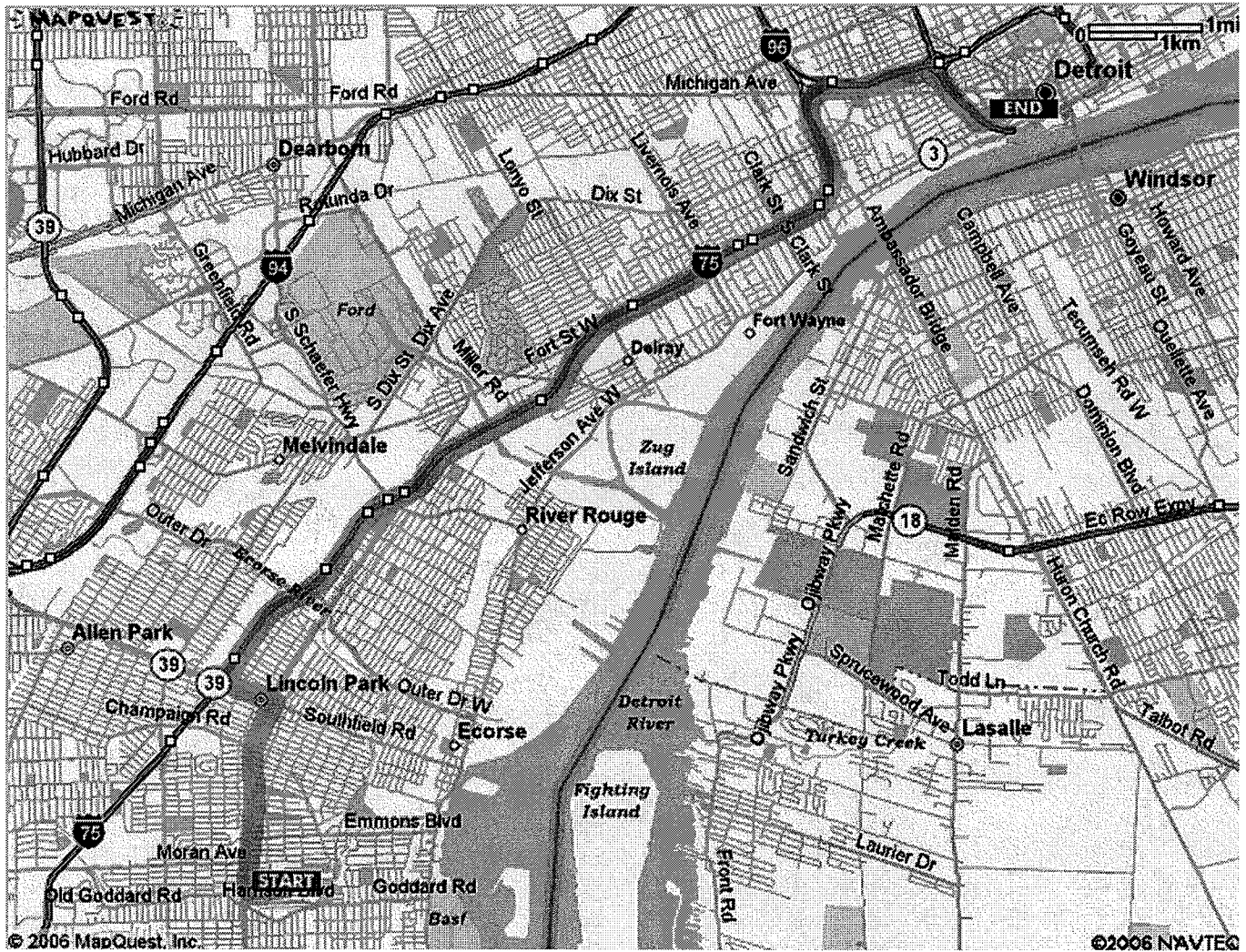
Total Est. Time:
 20 minutes

Total Est. Distance:
 12.79 miles

Maneuvers	Distance
1: Start out going WEST on ST JOHNS BLVD toward FERRIS AVE.	0.3 miles
2: Turn RIGHT onto FORT ST / MI-85 N.	1.6 miles
3: Turn RIGHT onto PARK AVE.	<0.1 miles
4: Turn LEFT onto MCKINLEY ST.	<0.1 miles
5: Turn LEFT onto SOUTHFIELD RD.	0.4 miles
6: Merge onto I-75 N toward DETROIT.	8.1 miles
7: Take EXIT 49 toward M-10 / LODGE FWY / ROSA PARKS BLVD / CIVIC CENTER.	0.3 miles
8: Take the exit on the LEFT toward M-10 / LODGE FWY / CIVIC CENTER.	0.2 miles
9: Take the M-10 S exit toward CIVIC CENTER.	0.6 miles
10: Merge onto JOHN C LODGE FWY / MI-10 S.	0.2 miles
11: Take the HOWARD ST exit toward COBO ROOF.	0.1 miles
12: Keep LEFT at the fork to go on 5TH ST.	<0.1 miles
13: Turn LEFT onto W LAFAYETTE BLVD.	0.4 miles
14: End at 231 W Lafayette Blvd Detroit, MI 48226-2700, US	

Total Est. Time: 20 minutes
 12.79 miles

Total Est. Distance:



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START 2792 Broadmoor Dr
 Rochester Hills, MI 48309-1368, US

END 844 N King St
 Wilmington, DE 19801-3519, US

Total Est. Time:
 10 hours, 0 minutes

Total Est. Distance:
 604.43 miles

Maneuvers	Distance
 1: Start out going WEST on BROADMOOR DR toward WINTER PARK RD.	<0.1 miles
 2: Turn RIGHT onto STEAMBOAT SPRINGS DR.	<0.1 miles
 3: Turn LEFT onto POWDERHORN RIDGE RD.	0.1 miles
 4: Turn LEFT onto N ADAMS RD.	1.5 miles
 5: Turn LEFT onto W AVON RD.	0.8 miles
 6: Turn RIGHT onto CROOKS RD.	4.7 miles
 7: Turn LEFT onto CORPORATE DR.	<0.1 miles
 8: Merge onto I-75 S toward DETROIT.	18.6 miles
 9: Merge onto I-94 W via EXIT 53B toward CHICAGO.	2.6 miles
 10: Merge onto I-96 E / JEFFRIES FWY via EXIT 213B toward CANADA.	1.4 miles
 11: Merge onto I-75 S toward TOLEDO.	52.6 miles
 12: Merge onto I-280 S via EXIT 208 on the LEFT toward I-80 / I-90 / TURNPIKE.	12.6 miles
 13: Merge onto I-80 E via EXIT 1A toward CLEVELAND (Portions toll).	146.8 miles
 14: Merge onto I-76 E via the exit on the LEFT (Portions toll).	335.8 miles
 15: Take the PA-100 exit- EXIT 312-	0.4 miles

toward POTTSTOWN / WEST CHESTER.



16: Merge onto PA-100 S toward
DOWNTOWN.

7.6 miles



17: Take US-202 S.

16.4 miles



18: US-202 S becomes DE-202 S.

1.2 miles



19: Turn RIGHT onto N MARKET ST / US-13
BR. Continue to follow US-13 BR S.

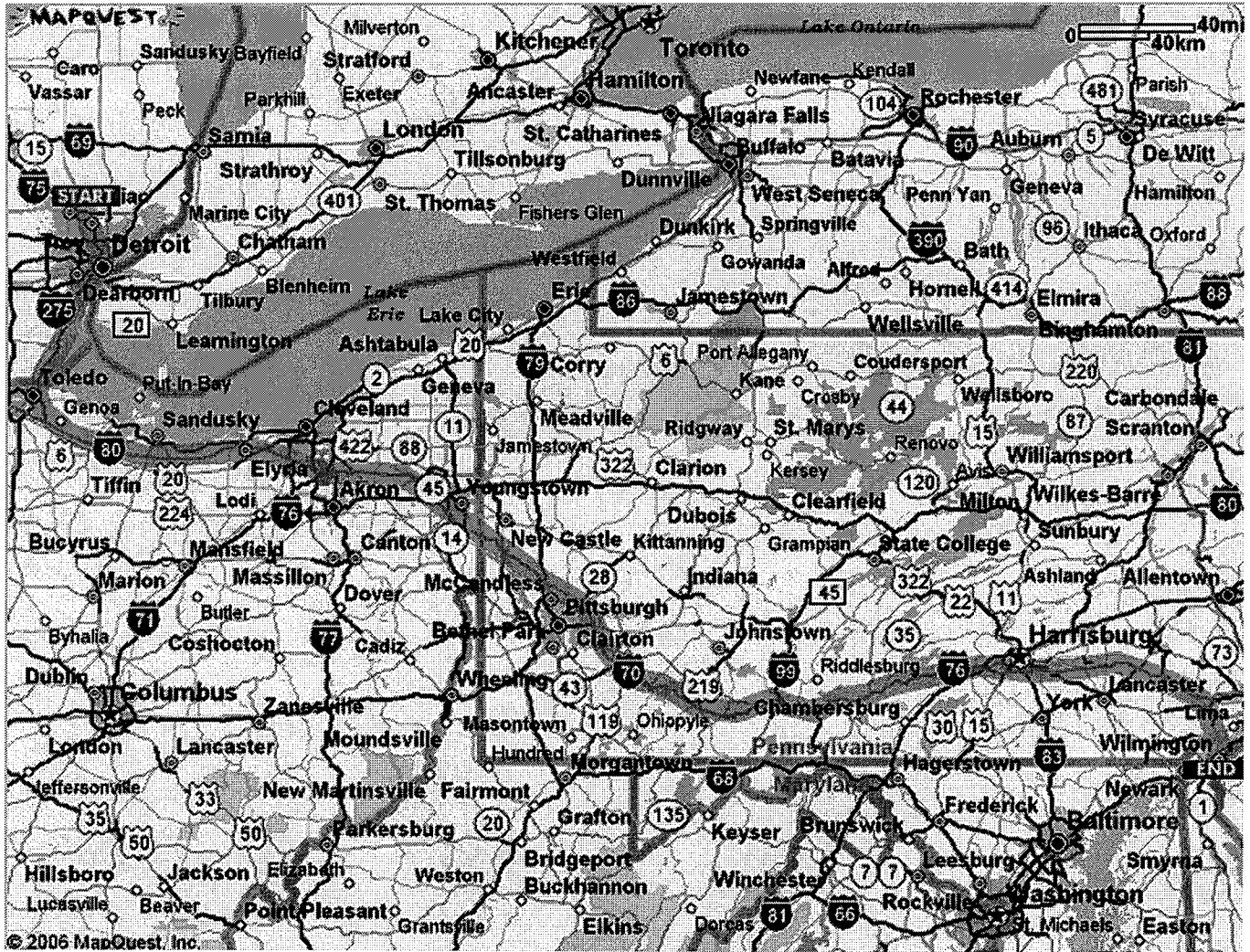
0.7 miles



20: End at **844 N King St**
Wilmington, DE 19801-3519, US

Total Est. Time: 10 hours, 0 minutes
Distance: 604.43 miles

Total Est.



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EXHIBIT I

(PART 2 OF 5)



START 2792 Broadmoor Dr
 Rochester Hills, MI 48309-1368, US

END 231 W Lafayette Blvd
 Detroit, MI 48226-2700, US

Total Est. Time:
 38 minutes

Total Est. Distance:
 29.40 miles

Maneuvers	Distance
1: Start out going WEST on BROADMOOR DR toward WINTER PARK RD.	<0.1 miles
2: Turn RIGHT onto STEAMBOAT SPRINGS DR.	<0.1 miles
3: Turn LEFT onto POWDERHORN RIDGE RD.	0.1 miles
4: Turn LEFT onto N ADAMS RD.	1.5 miles
5: Turn LEFT onto W AVON RD.	0.8 miles
6: Turn RIGHT onto CROOKS RD.	4.7 miles
7: Turn LEFT onto CORPORATE DR.	<0.1 miles
8: Merge onto I-75 S toward DETROIT.	20.7 miles
9: Merge onto I-375 S / CHRYSLER FWY via EXIT 51C on the LEFT toward CIVIC CENTER.	0.1 miles
10: Take the MADISON AVE exit on the LEFT.	0.2 miles
11: Take the MADISON ST ramp.	0.1 miles
12: Turn SLIGHT RIGHT onto MADISON ST.	<0.1 miles
13: Turn LEFT onto BEAUBIEN ST.	<0.1 miles
14: Turn RIGHT onto GRATIOT AVE / MI-3. Continue to follow GRATIOT AVE.	0.3 miles
15: GRATIOT AVE becomes STATE ST.	<0.1 miles
16: Turn LEFT onto GRISWOLD ST.	<0.1 miles

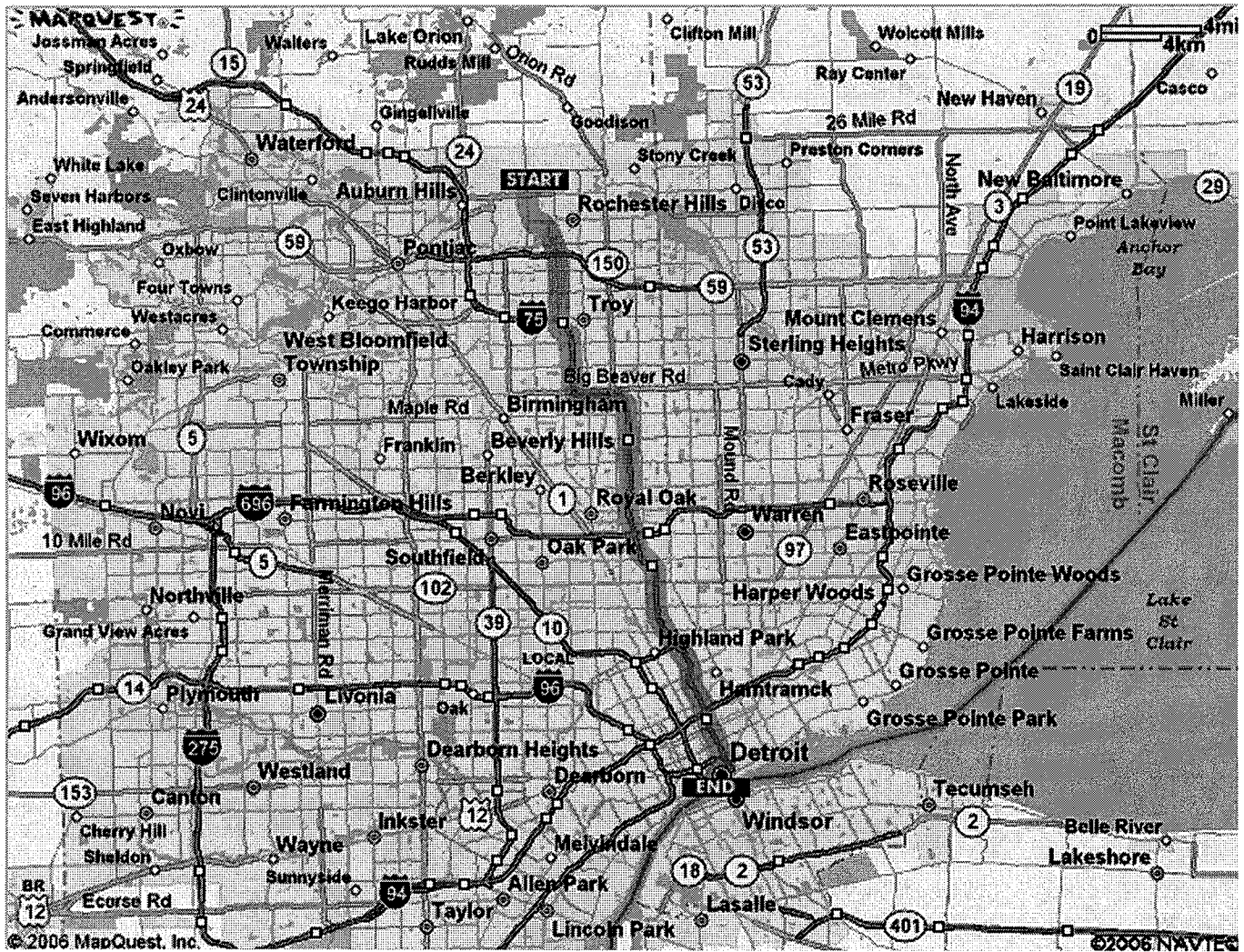


17: Turn RIGHT onto W LAFAYETTE BLVD. <0.1 miles



18: End at **231 W Lafayette Blvd**
Detroit, MI 48226-2700, US

Total Est. Time: 38 minutes **Total Est. Distance:**
29.40 miles



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Start: 29292 Marvin Rd
Farmington Hills, MI 48331-2646,
US

End: 844 N King St
Wilmington, DE 19801-3519, US

Notes:



Directions

Distance

Total Est. Time: 9 hours, 38 minutes **Total Est. Distance:** 588.87 miles

	1: Start out going NORTH on MARVIN RD toward W 13 MILE RD.	<0.1 miles
	2: Turn RIGHT onto W 13 MILE RD.	1.6 miles
	3: Turn RIGHT onto ORCHARD LAKE RD.	1.0 miles
	4: Merge onto I-696 W / WALTER P REUTHER FWY toward LANSING.	3.2 miles
	5: Merge onto I-275 S via EXIT 1 toward DETROIT / TOLEDO.	36.9 miles
	6: Merge onto I-75 S via the exit on the LEFT toward TOLEDO.	24.1 miles
	7: Merge onto I-280 S via EXIT 208 on the LEFT toward I-80 / I-90 / TURNPIKE.	12.6 miles
	8: Merge onto I-80 E via EXIT 1A toward CLEVELAND (Portions toll).	146.8 miles
	9: Merge onto I-76 E via the exit on the LEFT (Portions toll).	335.8 miles
	10: Take the PA-100 exit- EXIT 312- toward POTTSTOWN / WEST CHESTER.	0.4 miles
	11: Merge onto PA-100 S toward DOWNINGTOWN.	7.6 miles
	12: Take US-202 S.	16.4 miles
	13: US-202 S becomes DE-202 S.	1.2 miles
	14: Turn RIGHT onto N MARKET ST / US-13 BR. Continue to follow US-13 BR S.	0.7 miles
	15: End at 844 N King St Wilmington, DE 19801-3519, US	

Total Est. Time: 9 hours, 38 minutes

Total Est. Distance: 588.87 miles



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








START 29292 Marvin Rd
 Farmington Hills, MI 48331-2646, US

END 231 W Lafayette Blvd
 Detroit, MI 48226-2700, US

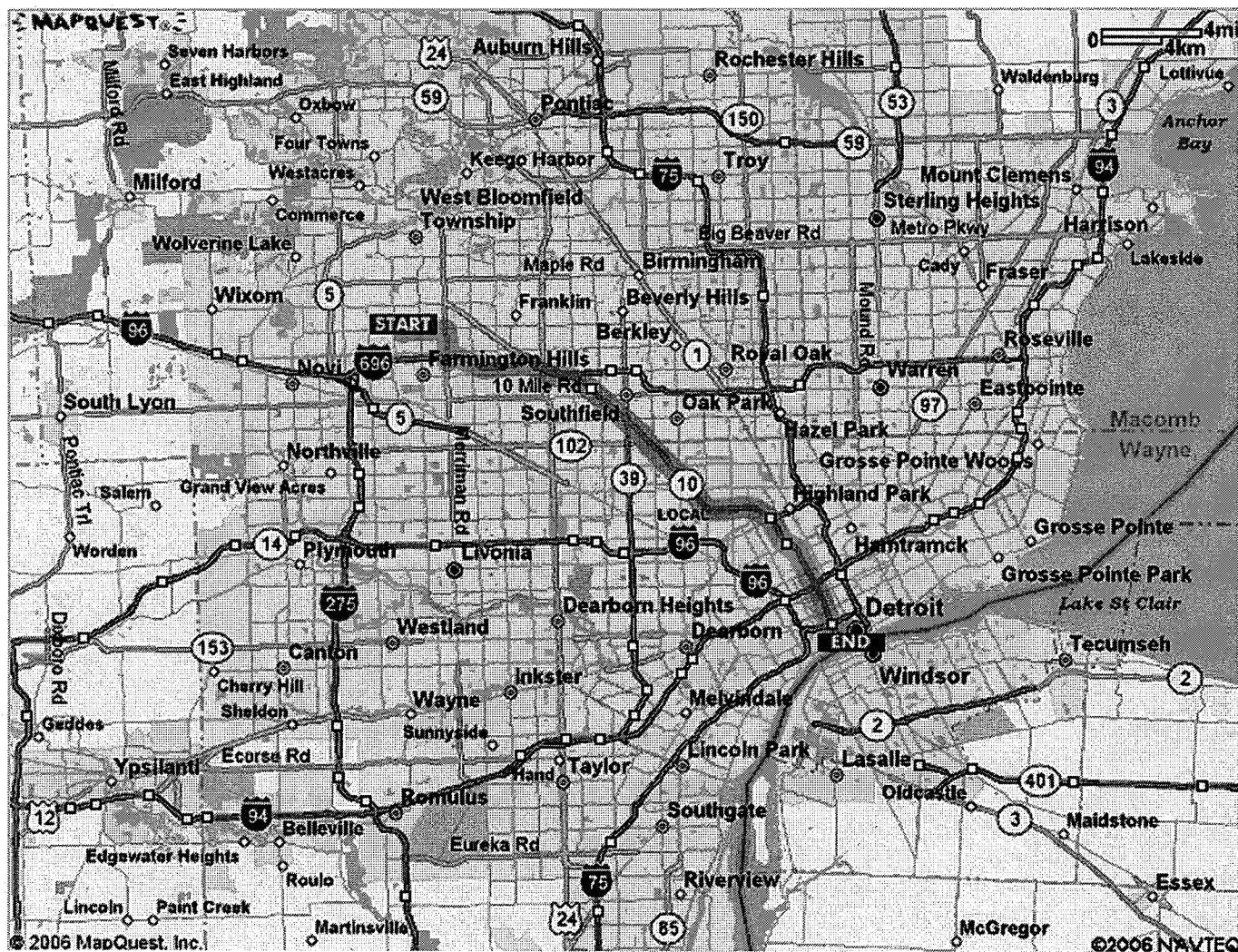
Total Est. Time:
 32 minutes

Total Est. Distance:
 24.95 miles

Maneuvers	Distance
 1: Start out going NORTH on MARVIN RD toward W 13 MILE RD.	<0.1 miles
 2: Turn RIGHT onto W 13 MILE RD.	1.6 miles
 3: Turn RIGHT onto ORCHARD LAKE RD.	1.2 miles
 4: Merge onto I-696 E / WALTER P REUTHER FWY toward DETROIT.	3.4 miles
 5: Merge onto JOHN C LODGE FWY / MI-10 S via EXIT 8 toward US-24 / TELEGRAPH RD.	17.8 miles
 6: Take the HOWARD ST exit toward COBO ROOF.	0.1 miles
 7: Keep LEFT at the fork to go on 5TH ST.	<0.1 miles
 8: Turn LEFT onto W LAFAYETTE BLVD.	0.4 miles
 9: End at 231 W Lafayette Blvd Detroit, MI 48226-2700, US	

Total Est. Time: 32 minutes
 24.95 miles

Total Est. Distance:



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EXHIBIT I

(PART 3 OF 5)
















START **Cousineau Road**
Windsor, ON N9H, CA


END **844 N King St**
Wilmington, DE 19801-3519, US


Total Est. Time:
9 hours, 37 minutes

Total Est. Distance:
580.75 miles

Maneuvers	Distance
 1: Start out going NORTHEAST on SANDWICH PKWY W toward TALBOT RD / PROVINCIAL ROUTE 3 S.	<0.1 miles
 2: Stay STRAIGHT to go onto COUSINEAU RD.	<0.1 miles
 3: Turn LEFT onto TALBOT RD / PROVINCIAL ROUTE 3 N. Continue to follow PROVINCIAL ROUTE 3 N (Portions toll) (Crossing into *UNITED STATES* MICHIGAN).	6.0 miles
 4: PROVINCIAL ROUTE 3 N becomes AMBASSADOR BRIDGE.	0.7 miles
 5: AMBASSADOR BRIDGE becomes W FISHER FWY.	0.2 miles
 6: Turn LEFT onto VERNOR HWY W.	<0.1 miles
 7: Turn LEFT onto FISHER FWY W.	0.4 miles
 8: FISHER FWY W becomes LAFAYETTE BLVD W.	0.5 miles
 9: LAFAYETTE BLVD W becomes FISHER FWY W.	<0.1 miles
 10: Merge onto I-75 S via the ramp on the LEFT (Crossing into OHIO).	50.7 miles
 11: Merge onto I-280 S via EXIT 208 on the LEFT toward I-80 / I-90 / TURNPIKE.	12.6 miles
 12: Merge onto I-80 E via EXIT 1A toward CLEVELAND (Portions toll).	146.8 miles

 **13:** Merge onto I-76 E via the exit on the **335.8 miles**
LEFT (Portions toll) (Crossing into
PENNSYLVANIA).


 **14:** Take the PA-100 exit- EXIT 312- **0.4 miles**
toward POTTSTOWN / WEST CHESTER.

 **15:** Merge onto PA-100 S toward **7.6 miles**
DOWNINGTOWN.

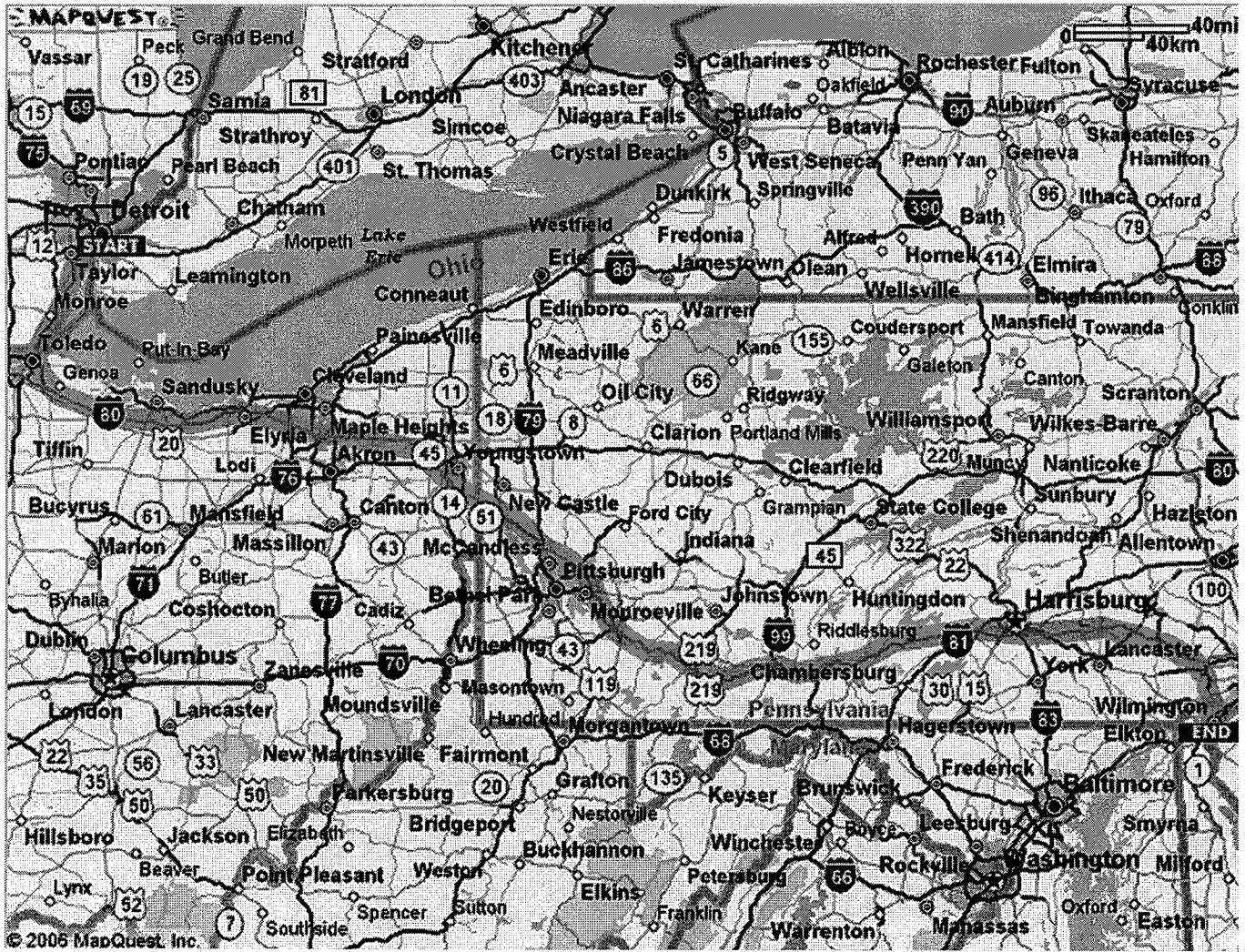
 **16:** Take US-202 S (Crossing into **16.4 miles**
DELAWARE).

 **17:** US-202 S becomes DE-202 S. **1.2 miles**

 **18:** Turn RIGHT onto N MARKET ST / US-13 **0.7 miles**
BR. Continue to follow US-13 BR S.

 **19:** End at **844 N King St**
Wilmington, DE 19801-3519, US

Total Est. Time: 9 hours, 37 minutes **Total Est.**
Distance: 580.75 miles



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START **Cousineau Road**
Windsor, ON N9H, CA

END **231 W Lafayette Blvd**
Detroit, MI 48226-2700, US

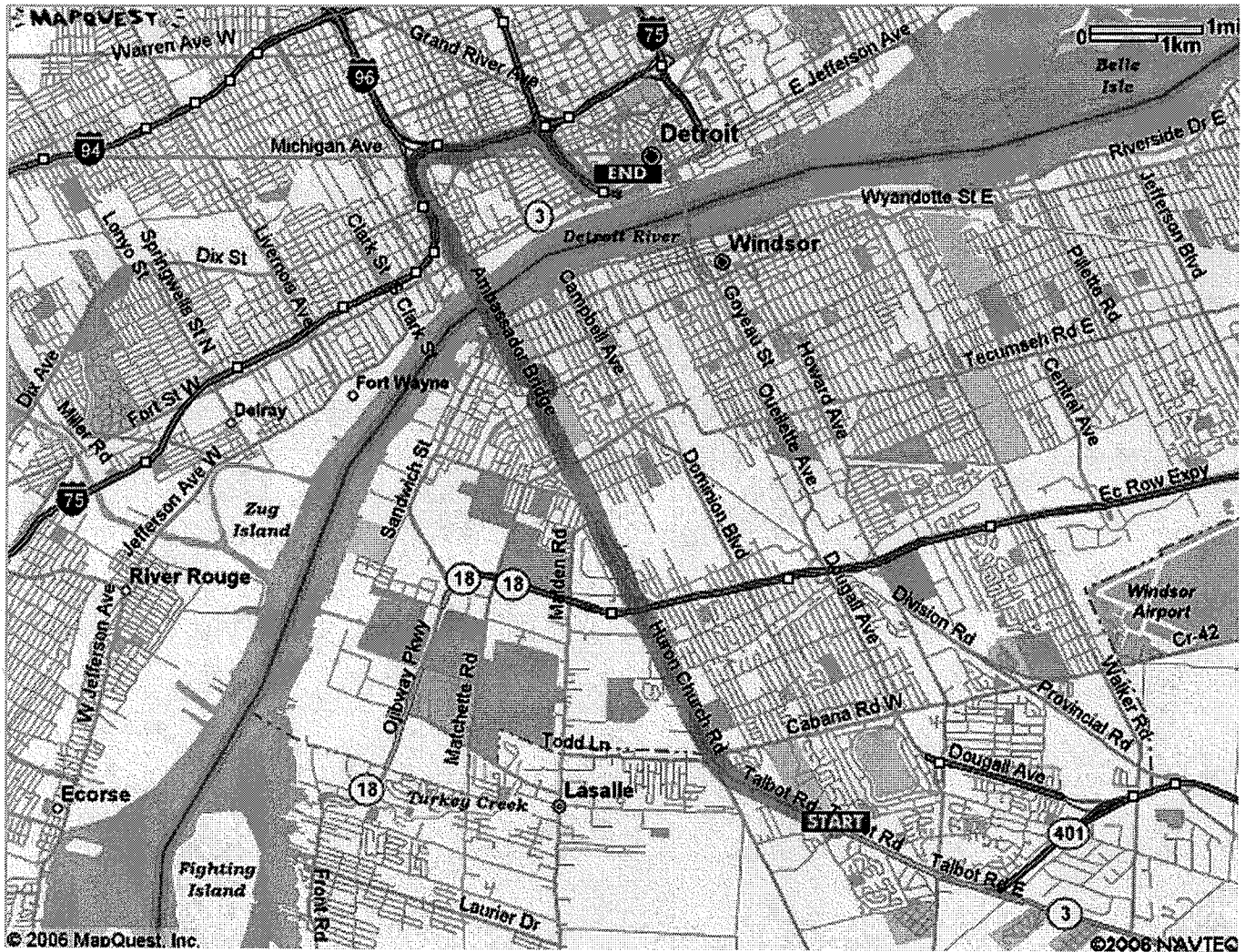
Total Est. Time:
18 minutes

Total Est. Distance:
9.73 miles

Maneuvers	Distance
 1: Start out going NORTHEAST on SANDWICH PKWY W toward TALBOT RD / PROVINCIAL ROUTE 3 S.	<0.1 miles
 2: Stay STRAIGHT to go onto COUSINEAU RD.	<0.1 miles
 3: Turn LEFT onto TALBOT RD / PROVINCIAL ROUTE 3 N. Continue to follow PROVINCIAL ROUTE 3 N (Portions toll).	6.0 miles
 4: PROVINCIAL ROUTE 3 N becomes AMBASSADOR BRIDGE.	0.7 miles
 5: AMBASSADOR BRIDGE becomes W FISHER FWY.	<0.1 miles
 6: Merge onto I-75 N toward DETROIT.	0.7 miles
 7: Take EXIT 49 toward M-10 / LODGE FWY / ROSA PARKS BLVD / CIVIC CENTER.	0.3 miles
 8: Take the exit on the LEFT toward M-10 / LODGE FWY / CIVIC CENTER.	0.2 miles
 9: Take the M-10 S exit toward CIVIC CENTER.	0.6 miles
 10: Merge onto JOHN C LODGE FWY / MI-10 S.	0.2 miles
 11: Take the HOWARD ST exit toward COBO ROOF.	0.1 miles
 12: Keep LEFT at the fork to go on 5TH ST.	<0.1 miles
 13: Turn LEFT onto W LAFAYETTE BLVD.	0.4 miles

END 14: End at 231 W Lafayette Blvd
Detroit, MI 48226-2700, US















Total Est. Time: 18 minutes **Total Est. Distance:**
9.73 miles








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**START** Reeds Spring, MO US**END** 844 N King St
Wilmington, DE 19801-
3519, US**Total Est. Time:**
18 hours, 18 minutes**Total Est. Distance:**
1134.31 miles

Maneuvers	Distance
 1: Start out going NORTHWEST on E SPRING ST toward MO-265 / E MAIN ST / MO-413.	<0.1 miles
 2: Turn RIGHT onto MO-265 / E MAIN ST / MO-413.	0.4 miles
 3: Turn RIGHT onto MO-248.	1.4 miles
 4: Turn LEFT onto MO-13 / MO-248.	0.7 miles
 5: Turn RIGHT onto US-160 / MO-248. Continue to follow US-160.	8.9 miles
 6: Merge onto US-65 N via the ramp on the LEFT toward SPRINGFIELD.	35.2 miles
 7: Merge onto I-44 E toward ST LOUIS.	207.4 miles
 8: Take the I-55 N exit- EXIT 290A- on the LEFT toward I-70 EAST / ILLINOIS.	<0.1 miles
 9: Merge onto I-55 N via EXIT 290B toward I-70 EAST / ILLINOIS.	20.6 miles
 10: Merge onto I-70 E toward INDIANAPOLIS.	516.9 miles
 11: Merge onto I-470 E via EXIT 219 toward BELLAIRE / WASHINGTON PA.	10.5 miles
 12: Merge onto I-70 E.	66.7 miles
 13: Merge onto I-76 E via EXIT 58 toward BREEZEWOOD / NEW JERSEY (Portions toll).	238.4 miles
 14: Take the PA-100 exit- EXIT 312-	0.4 miles

toward POTTSTOWN / WEST CHESTER.

-  **15:** Merge onto PA-100 S toward DOWNINGTOWN. 7.6 miles
-  **16:** Take US-202 S. 16.4 miles
-  **17:** US-202 S becomes DE-202 S. 1.2 miles
-  **18:** Turn RIGHT onto N MARKET ST / US-13 BR. Continue to follow US-13 BR S. 0.7 miles
-  **19:** End at **844 N King St**
Wilmington, DE 19801-3519, US

Total Est. Time: 18 hours, 18 minutes

Total Est. Distance: 1134.31 miles



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START Reeds Spring, MO US

END 231 W Lafayette Blvd
Detroit, MI 48226-2700, US

Total Est. Time:
12 hours, 33 minutes

Total Est. Distance:
804.83 miles

Maneuvers	Distance
 1: Start out going NORTHWEST on E SPRING ST toward MO-265 / E MAIN ST / MO-413.	<0.1 miles
 2: Turn RIGHT onto MO-265 / E MAIN ST / MO-413.	0.4 miles
 3: Turn RIGHT onto MO-248.	1.4 miles
 4: Turn LEFT onto MO-13 / MO-248.	0.7 miles
 5: Turn RIGHT onto US-160 / MO-248. Continue to follow US-160.	8.9 miles
 6: Merge onto US-65 N via the ramp on the LEFT toward SPRINGFIELD.	35.2 miles
 7: Merge onto I-44 E toward ST LOUIS.	207.4 miles
 8: Take the I-55 N exit- EXIT 290A- on the LEFT toward I-70 EAST / ILLINOIS.	<0.1 miles
 9: Merge onto I-55 N via EXIT 290B toward I-70 EAST / ILLINOIS.	252.3 miles
 10: Merge onto I-80 E via EXIT 250A toward TOLEDO (Portions toll).	52.5 miles
 11: Merge onto I-94 E.	201.1 miles
 12: Take the M-14 exit- EXIT 171- on the LEFT toward PLYMOUTH.	0.5 miles
 13: Merge onto MI-14 E.	22.0 miles
 14: MI-14 E becomes I-96 E / JEFFRIES FWY.	19.2 miles
 15: Take the I-75 N / M-10 exit on the LEFT toward FLINT / CIVIC CTR.	0.3 miles

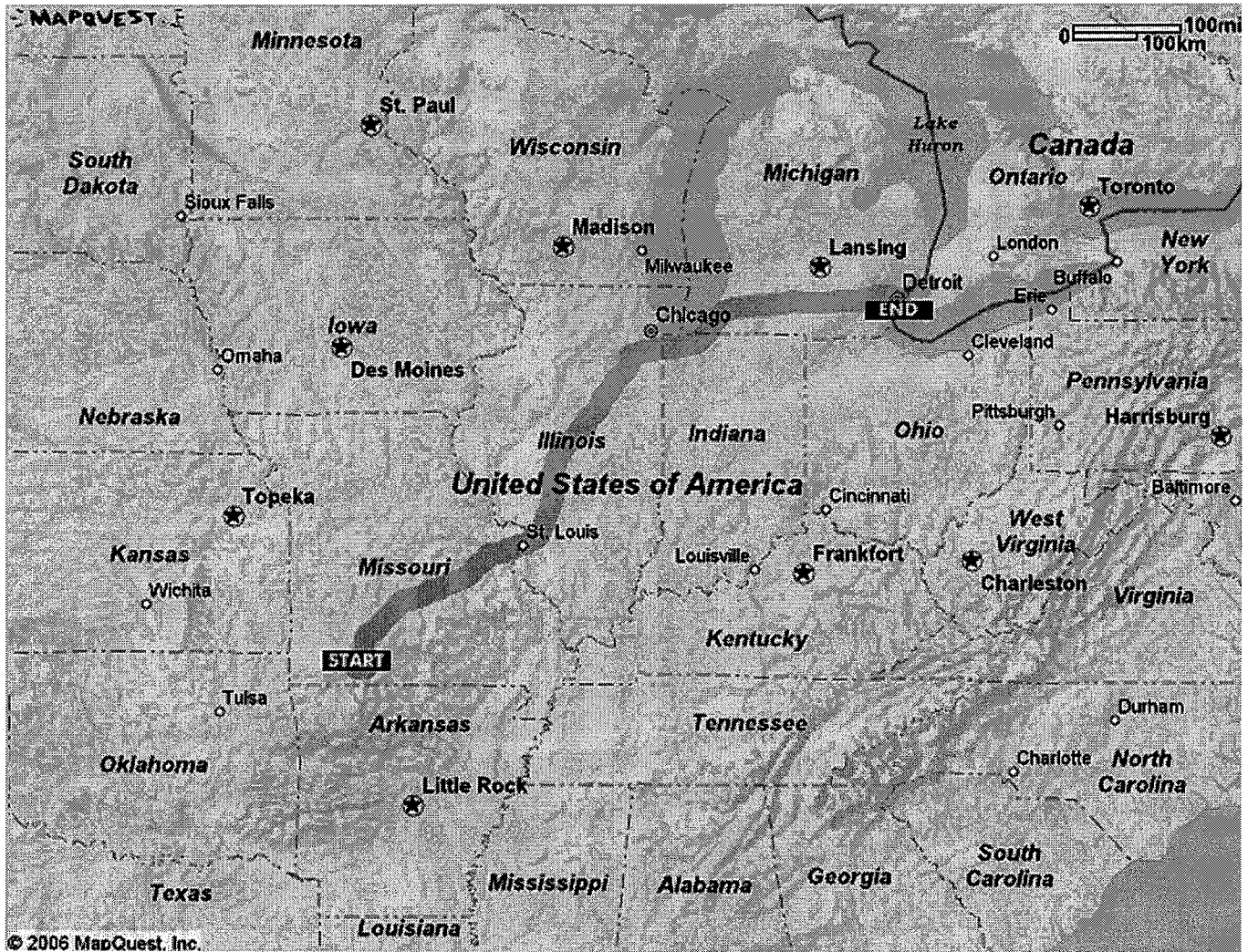
-
-  **16:** Take the M-10 / LODGE FWY exit toward ROSA PARKS BLVD / CIVIC CENTER. 0.4 miles
-
-  **17:** Take the exit on the LEFT toward M-10 / LODGE FWY / CIVIC CENTER. 0.2 miles
-
-  **18:** Take the M-10 S exit toward CIVIC CENTER. 0.6 miles
-
-  **19:** Merge onto JOHN C LODGE FWY / MI-10 S. 0.2 miles
-
-  **20:** Take the HOWARD ST exit toward COBO ROOF. 0.1 miles
-
-  **21:** Keep LEFT at the fork to go on 5TH ST. <0.1 miles
-
-  **22:** Turn LEFT onto W LAFAYETTE BLVD. 0.4 miles
-
-  **23:** End at **231 W Lafayette Blvd**
Detroit, MI 48226-2700, US
-

Total Est. Time: 12 hours, 33 minutes **Total Est.**
Distance: 804.83 miles

EXHIBIT I

(PART 4 OF 5)

Driving Directions from Reeds Spring, MO to 231 W Lafayette Blvd, Detroit, MI



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EXHIBIT I

(PART 5 OF 5)


















START 210 Riverside Ave
Chowchilla, CA 93610-
2529, US


END 844 N King St
Wilmington, DE 19801-
3519, US


Total Est. Time:
43 hours, 2 minutes

Total Est. Distance:
2867.80 miles

Maneuvers	Distance
 1: Start out going NORTHEAST on RIVERSIDE AVE toward N 2ND ST.	<0.1 miles
 2: Turn RIGHT onto N 2ND ST.	0.1 miles
 3: Turn LEFT onto CA-233 / W ROBERTSON BLVD.	0.3 miles
 4: Merge onto CA-99 S.	146.1 miles
 5: Merge onto CA-58 E toward TEHACHAPI / MOJAVE.	125.9 miles
 6: Merge onto I-15 N via the exit on the LEFT toward LAS VEGAS.	4.4 miles
 7: Merge onto I-40 E.	1210.6 miles
 8: Merge onto I-44 E via EXIT 147B on the LEFT toward TULSA / WICHITA.	15.3 miles
 9: Merge onto I-44 E via EXIT 138A toward TULSA (Portions toll).	484.6 miles
 10: Take the I-55 N exit- EXIT 290A- on the LEFT toward I-70 EAST / ILLINOIS.	<0.1 miles
 11: Merge onto I-55 N via EXIT 290B toward I-70 EAST / ILLINOIS.	20.6 miles
 12: Merge onto I-70 E toward INDIANAPOLIS.	516.9 miles
 13: Merge onto I-470 E via EXIT 219 toward BELLAIRE / WASHINGTON PA.	10.5 miles
 14: Merge onto I-70 E.	66.7 miles

 **15:** Merge onto I-76 E via EXIT 58 toward 238.4 miles
BREEZEWOOD / NEW JERSEY
(Portions toll).


 **16:** Take the PA-100 exit- EXIT 312- 0.4 miles
toward POTTSTOWN / WEST
CHESTER.

 **17:** Merge onto PA-100 S toward 7.6 miles
DOWNTOWN.

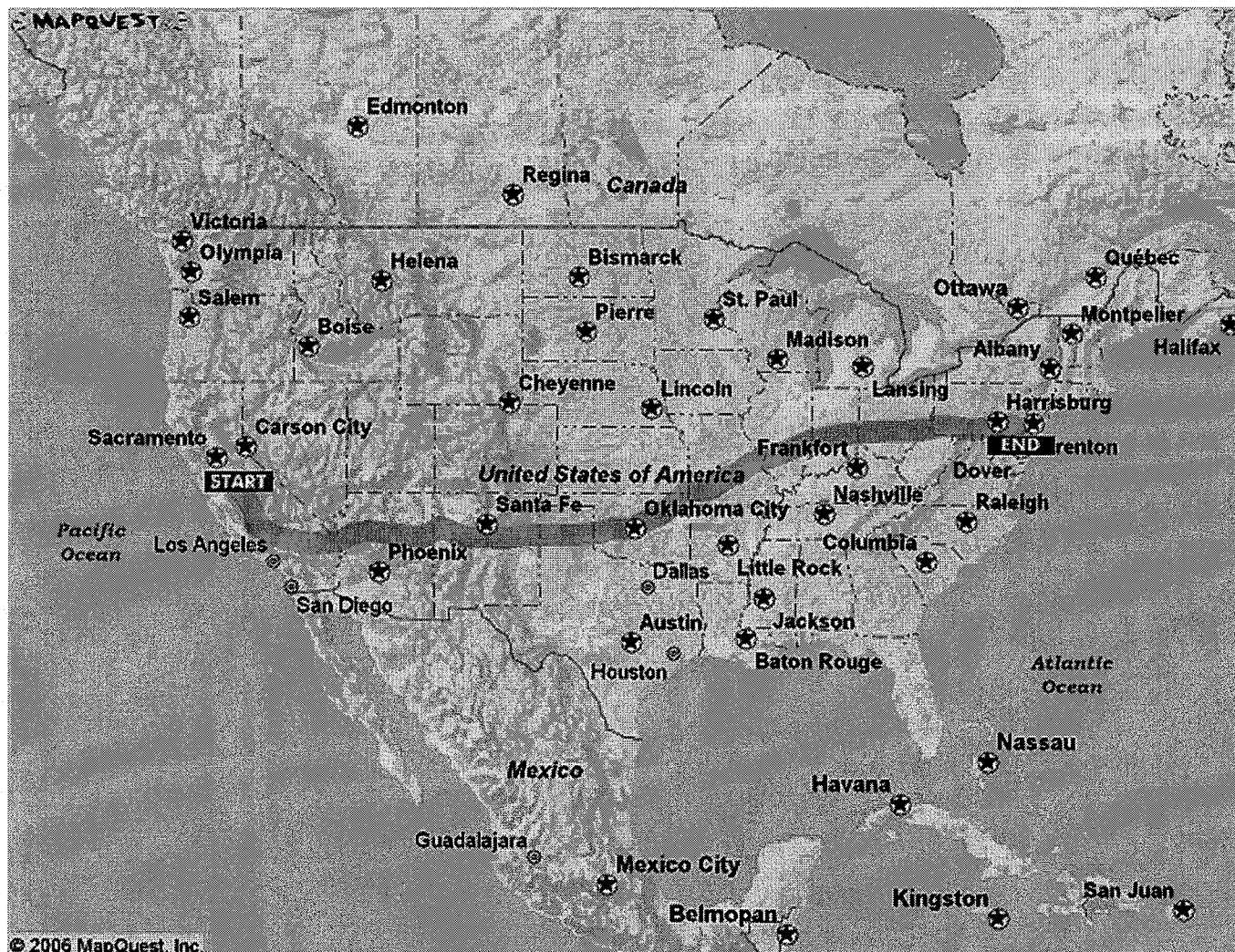
 **18:** Take US-202 S. 16.4 miles

 **19:** US-202 S becomes DE-202 S. 1.2 miles

 **20:** Turn RIGHT onto N MARKET ST / US- 0.7 miles
13 BR. Continue to follow US-13 BR S.

 **21:** End at **844 N King St**
Wilmington, DE 19801-3519, US

Total Est. Time: 43 hours, 2 minutes **Total Est.**
Distance: 2867.80 miles



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




START 210 Riverside Ave
Chowchilla, CA 93610-
2529, US

END 231 W Lafayette Blvd
Detroit, MI 48226-2700, US

Total Est. Time:
35 hours, 26 minutes

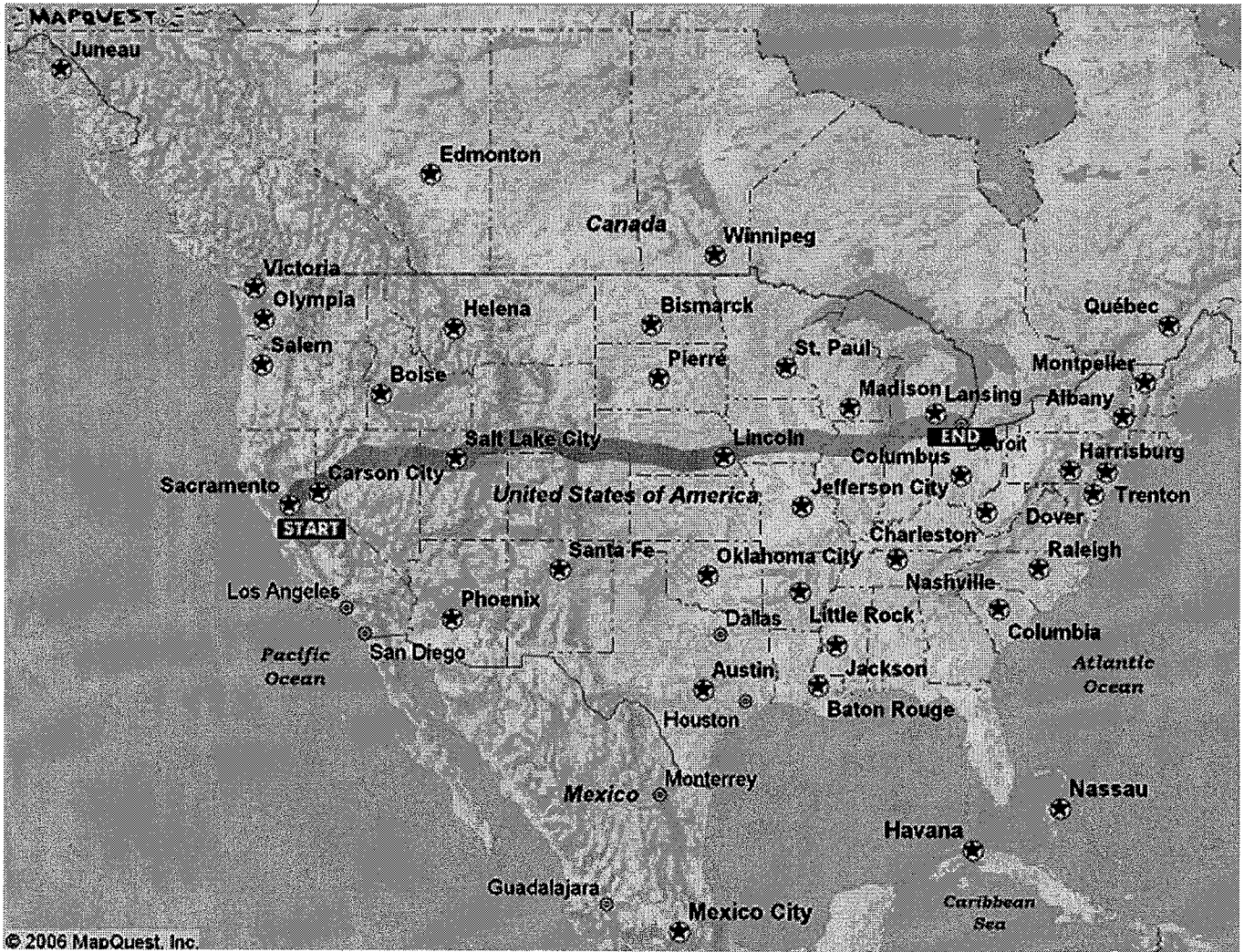
Total Est. Distance:
2443.01 miles

Maneuvers	Distance
1: Start out going NORTHEAST on RIVERSIDE AVE toward N 2ND ST.	<0.1 miles
2: Turn RIGHT onto N 2ND ST.	0.1 miles
3: Turn LEFT onto CA-233 / W ROBERTSON BLVD.	0.6 miles
4: Merge onto CA-99 N.	128.1 miles
5: Take CAPITAL CITY FWY toward RENO.	9.3 miles
6: Merge onto I-80 E.	641.9 miles
7: Merge onto I-80 E via EXIT 304 toward CHEYENNE.	1054.7 miles
8: Merge onto I-80 E via EXIT 123B toward CHICAGO / MINNEAPOLIS.	166.6 miles
9: Merge onto I-280 E via EXIT 290 toward ROCK ISLAND / MOLINE.	27.4 miles
10: I-280 E becomes I-80 E (Portions toll).	168.3 miles
11: Stay STRAIGHT to go onto I-94 E.	201.1 miles
12: Take the M-14 exit- EXIT 171- on the LEFT toward PLYMOUTH.	0.5 miles
13: Merge onto MI-14 E.	22.0 miles
14: MI-14 E becomes I-96 E / JEFFRIES FWY.	19.2 miles
15: Take the I-75 N / M-10 exit on the LEFT toward FLINT / CIVIC CTR.	0.3 miles

- | | | |
|---|--|------------|
|  | 16: Take the M-10 / LODGE FWY exit toward ROSA PARKS BLVD / CIVIC CENTER. | 0.4 miles |
|  | 17: Take the exit on the LEFT toward M-10 / LODGE FWY / CIVIC CENTER. | 0.2 miles |
|  | 18: Take the M-10 S exit toward CIVIC CENTER. | 0.6 miles |
|  | 19: Merge onto JOHN C LODGE FWY / MI-10 S. | 0.2 miles |
|  | 20: Take the HOWARD ST exit toward COBO ROOF. | 0.1 miles |
|  | 21: Keep LEFT at the fork to go on 5TH ST. | <0.1 miles |
|  | 22: Turn LEFT onto W LAFAYETTE BLVD. | 0.4 miles |
|  | 23: End at 231 W Lafayette Blvd
Detroit, MI 48226-2700, US | |

Total Est. Time: 35 hours, 26 minutes
Distance: 2443.01 miles

Total Est.



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BALI & INDONESIA ON THE NET

Distance between **Kiev, Ukraine** and **Wilmington, Delaware, United States**, as the crow flies:

4780 miles (7692 km) (4154 nautical miles)

Initial heading from Kiev to Wilmington:

northwest (307.7 degrees)

Initial heading from Wilmington to Kiev:

northeast (40.9 degrees)

- [Tourism Info: Bali & Indonesia](#)
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Wilmington Guide

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See [driving distance and directions](#) (courtesy [Maps.com](#))

Kiev, Ukraine [[hotels](#), [attractions](#), [books](#), [community](#)]

Location: **50:30:00N 30:28:00E**

Wilmington, Delaware, US [[hotels](#), [attractions](#), [books](#), [community](#), [map](#)]

County: **New Castle County**

Location: **39:44:08N 75:31:48W**

Population (1990): **71529**

Elevation: **100 feet**

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region	South Bali : Nusadua, Jimbaran, Tuban, Kuta, Seminyak, Kerobokan, Canggu, Sanur		
no. of rooms	1		
price range	don't care <input type="button" value="search"/>		

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BALI & INDONESIA ON THE NET

Distance between **Kiev, Ukraine** and **Detroit, Michigan, United States**, as the crow flies:

- Tourism Info: Bali & Indonesia
- All Hotels & Resorts in Bali
- International Hotels in Bali
- Jakarta Hotels
- International Hotels
- Travel8Ways.com: international hotels, flights, and tours by indo.com

4891 miles (7871 km) (4250 nautical miles)

Initial heading from Kiev to Detroit:

northwest (314.2 degrees)

Initial heading from Detroit to Kiev:

northeast (38.2 degrees)

See airfares between these two cities in [Travel8Ways.com](#).

See hotels in these two cities in [Hotels.Indo.Com](#) or [Travel8Ways.com](#).

See driving distance and directions (courtesy [Maps.com](#))

Kiev, Ukraine [[hotels](#), [attractions](#), [books](#), [community](#)]

Location: **50:30:00N 30:28:00E**

Detroit, Michigan, US [[hotels](#), [attractions](#), [books](#), [community](#), [map](#)]

County: **Wayne County**

Location: **42:22:59N 83:06:08W**

Population (1990): **1027974**

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check out	<input type="text"/>	<input type="text"/>	<input type="text" value="2001"/>
region	<input type="text" value="South Bali : Nusadua, Jimbaran, Tuban, Kuta, Seminyak, Kerobokan, Canggu, Sanur"/>		
no. of rooms	<input type="text" value="1"/>		
price range	<input type="text" value="don't care"/>	<input type="button" value="search"/>	

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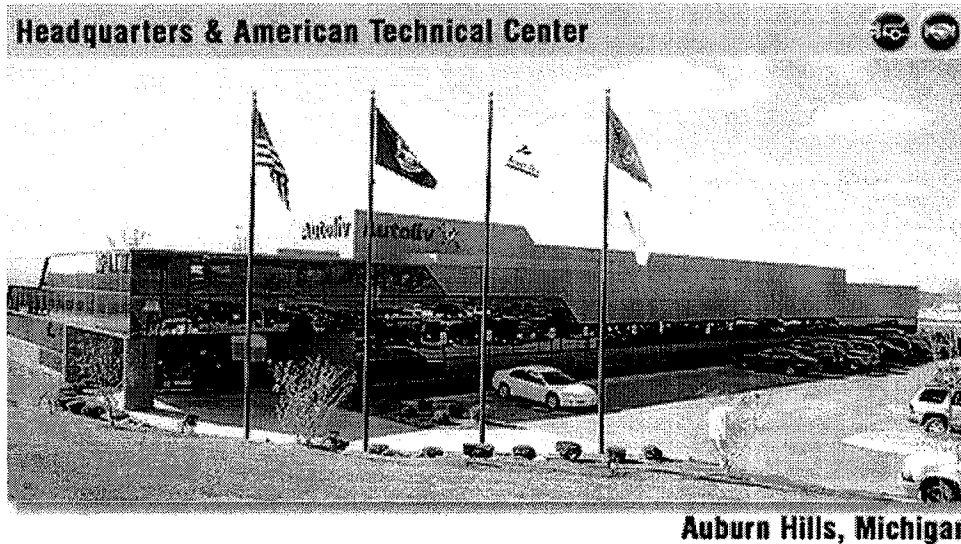
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EXHIBIT J

Worldwide



- ⌘ [Address & Phone](#)
- ⌘ [Driving Directions](#)

⌘ [Back to USA](#)

⌘ [Testing Services](#)

- [Barrier Testing](#)
- [Sled Testing](#)
- [Component Testing](#)
- [Test Capabilities](#)

⌘ [Support Services](#)

- Autoliv North America - Headquarters
- Data Analysis and Reporting
- Prototype Shop
- Dummy Calibration
- Fabrication/Machine Shop

⌘ [Engineering Services](#)

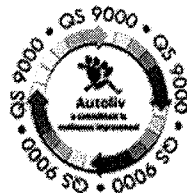
- Test Engineering
- Test Design/Development
- Test Implementation
- Occupant Simulation Analysis

⌘ [Size](#)

- 2 Sleds, 1 Enclosed Barrier, 14 Prep Bays
- 465 Employees (approx.)

⌘ [Certifications](#)

**QS 9000 Registered
Quality**



**ISO 14001 Registered
Environment**



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EXHIBIT K

(PART 1 OF 4)



Start: Newmarket, ON CA

End: 844 N King St
Wilmington, DE 19801-3519, US

Notes:

Holiday Inn Hotels: Official Site

Guaranteed Lowest Internet Rates

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[Click Here to Make a Reservation!](#)

Or Call 877-410-6681 to make a reservation

Directions

Distance

Total Est. Time: 9 hours, 8 minutes

Total Est. Distance: 546.73 miles

- | | | |
|--|--|------------|
| | 1: Start out going SOUTHEAST on GASTON PL toward LONDRY CT. | 0.1 miles |
| | 2: Turn LEFT onto LONDRY CT. | <0.1 miles |
| | 3: Turn RIGHT onto COLLEGE MANOR DR. | 0.3 miles |
| | 4: Turn LEFT onto MULOCK DR / RR-74. | 1.3 miles |
| | 5: Take the HWY-404 S ramp toward TORONTO. | 0.4 miles |
| | 6: Merge onto PROVINCIAL ROUTE 404 S. | 19.5 miles |
| | 7: Take the RTE-401 E / RTE-401 O / HWY-401 E / HWY-401 W exit. | 0.1 miles |
| | 8: Take the HWY-401 W exit. | <0.1 miles |
| | 9: Take the EXPRESS exit on the LEFT. | 0.4 miles |
| | 10: Merge onto HWY-401 EXPRESS W. | 13.5 miles |
| | 11: Take the RTE-427 S / HWY-427 S exit- EXIT 352- toward Q.E.W.. | 1.1 miles |
| | 12: Merge onto PROVINCIAL ROUTE 427 S. | 3.6 miles |
| | 13: Merge onto QEW toward HAMILTON. | 63.5 miles |
| | 14: Take the HWY-405 exit- EXIT 37- on the LEFT toward QUEENSTON. | 0.2 miles |
| | 15: Merge onto PROVINCIAL ROUTE 405 E. | 5.1 miles |
| | 16: PROVINCIAL ROUTE 405 E becomes QUEENSTON-LEWISTON BRIDGE
(Crossing into *UNITED STATES* NEW YORK). | 0.5 miles |



17: QUEENSTON-LEWISTON BRIDGE becomes I-190 S (Portions toll). 14.7 miles



18: Merge onto I-290 E / YOUNGMANN EXPY via EXIT 16 toward I-90 / TONAWANDA / ROCHESTER. 9.8 miles



19: Merge onto I-90 E / NEW YORK STATE THRUWAY E via EXIT 1-49 on the LEFT toward ALBANY (Portions toll). 130.7 miles



20: Merge onto I-690 E via EXIT 39 toward SYRACUSE / FAIRGROUNDS. 9.8 miles



21: Merge onto I-81 S (Crossing into PENNSYLVANIA). 124.1 miles



22: Take the PENNSYLVANIA TURNPIKE exit- EXIT 194- toward US-6 / US-11 / CLARKS SUMMIT. 0.1 miles



23: Merge onto I-476 S toward ALLENTOWN (Portions toll). 131.1 miles



24: Merge onto I-95 S toward CHESTER (Crossing into DELAWARE). 14.7 miles



25: Take EXIT 7A toward SR-52 S / DELAWARE AVE.. 0.1 miles



26: Stay STRAIGHT to go onto W 11TH ST. 0.5 miles



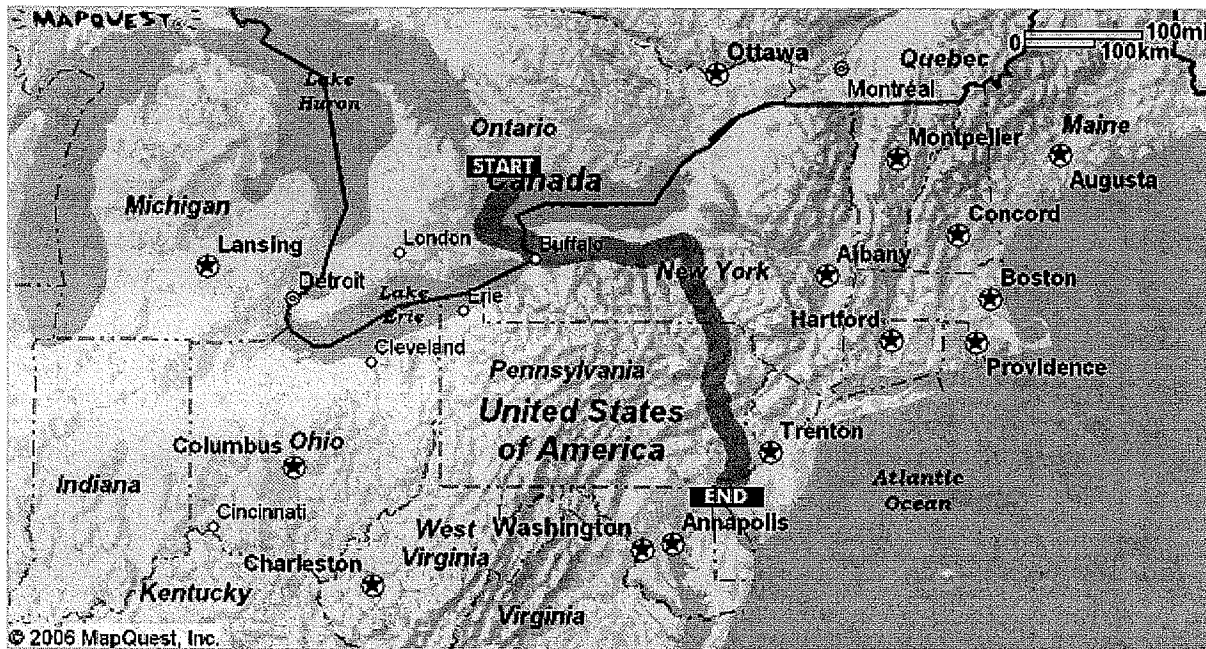
27: Turn RIGHT onto N KING ST / US-13 BR S. 0.1 miles



28: End at **844 N King St**
Wilmington, DE 19801-3519, US

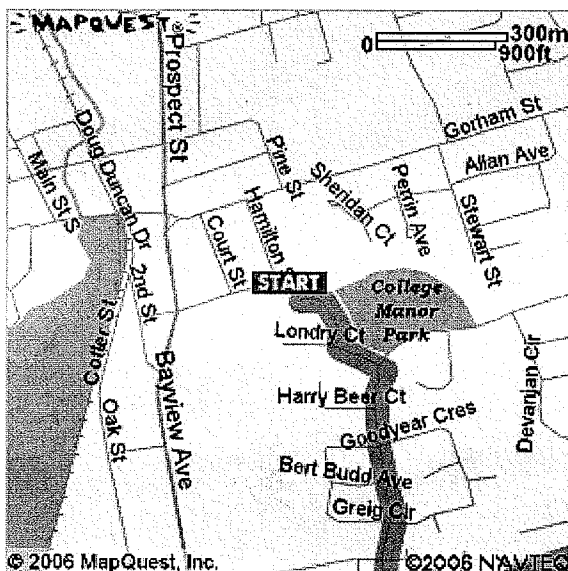
Total Est. Time: 9 hours, 8 minutes

Total Est. Distance: 546.73 miles



Start:
 Newmarket, ON CA

End:
 844 N King St
 Wilmington, DE 19801-3519, US



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Start: Newmarket, ON CA
End: 231 W Lafayette Blvd
Detroit, MI 48226-2700, US

Notes:



Directions

Distance

Total Est. Time: 4 hours, 32 minutes **Total Est. Distance:** 256.69 miles

- | | | |
|--|--|-------------|
| | 1: Start out going SOUTHEAST on GASTON PL toward LONDRY CT. | 0.1 miles |
| | 2: Turn LEFT onto LONDRY CT. | <0.1 miles |
| | 3: Turn RIGHT onto COLLEGE MANOR DR. | 0.3 miles |
| | 4: Turn LEFT onto MULOCK DR / RR-74. | 1.3 miles |
| | 5: Take the HWY-404 S ramp toward TORONTO. | 0.4 miles |
| | 6: Merge onto PROVINCIAL ROUTE 404 S. | 13.9 miles |
| | 7: Take the HWY-407 ETR exit- EXIT 26. | 0.2 miles |
| | 8: Merge onto HWY-407 ETR W (Portions toll). | 29.5 miles |
| | 9: Take the HWY-401 W exit- EXIT 34- toward LONDON. | 1.4 miles |
| | 10: Merge onto PROVINCIAL ROUTE 401 W. | 197.9 miles |
| | 11: Stay STRAIGHT to go onto TALBOT RD E / PROVINCIAL ROUTE 3 N.
Continue to follow PROVINCIAL ROUTE 3 N (Portions toll) (Crossing into *UNITED STATES* MICHIGAN). | 7.4 miles |
| | 12: PROVINCIAL ROUTE 3 N becomes AMBASSADOR BRIDGE. | 0.7 miles |
| | 13: AMBASSADOR BRIDGE becomes W FISHER FWY. | <0.1 miles |
| | 14: Merge onto I-75 N toward DETROIT. | 0.7 miles |
| | 15: Take EXIT 49 toward M-10 / LODGE FWY / ROSA PARKS BLVD / CIVIC CENTER. | 0.3 miles |
| | 16: Take the exit on the LEFT toward M-10 / LODGE FWY / CIVIC CENTER. | 0.2 miles |



17: Take the M-10 S exit toward CIVIC CENTER.

0.6 miles



18: Merge onto JOHN C LODGE FWY / MI-10 S.

0.2 miles



19: Take the HOWARD ST exit toward COBO ROOF.

0.1 miles



20: Keep LEFT at the fork to go on 5TH ST.

<0.1 miles



21: Turn LEFT onto W LAFAYETTE BLVD.

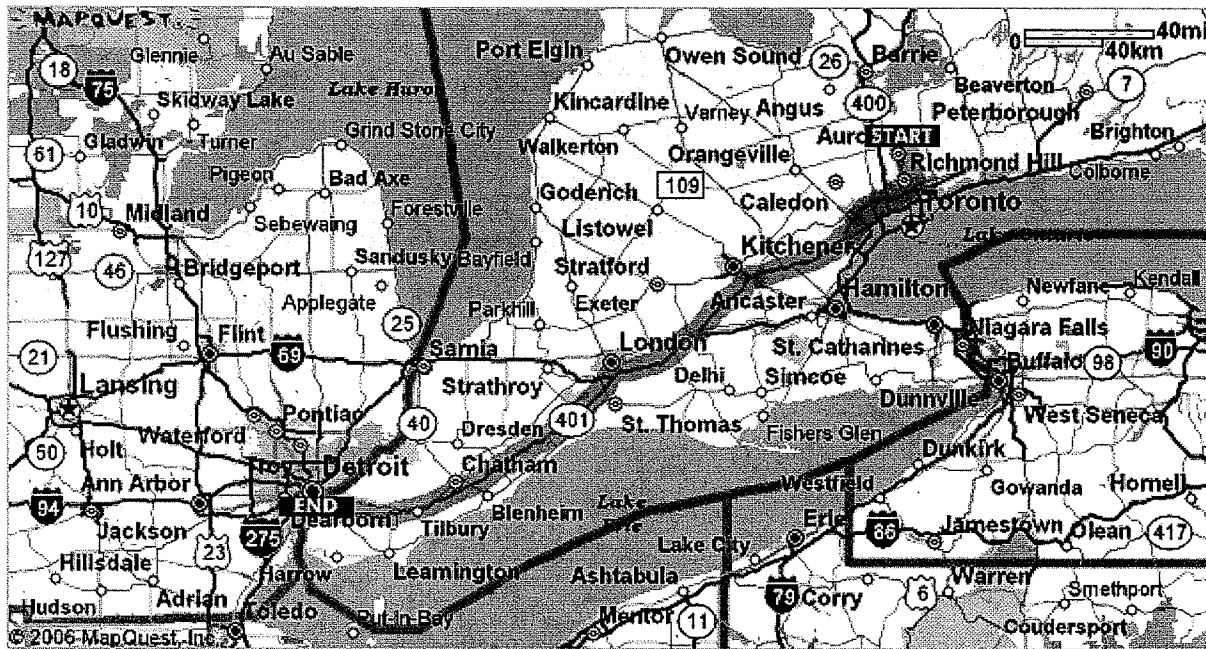
0.4 miles



22: End at **231 W Lafayette Blvd**
Detroit, MI 48226-2700, US

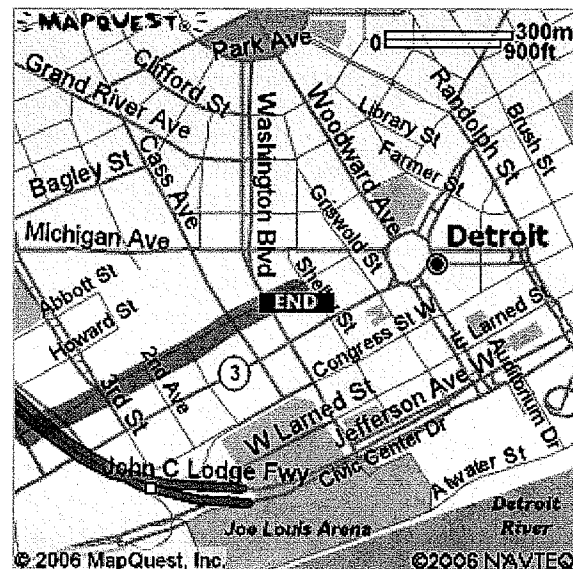
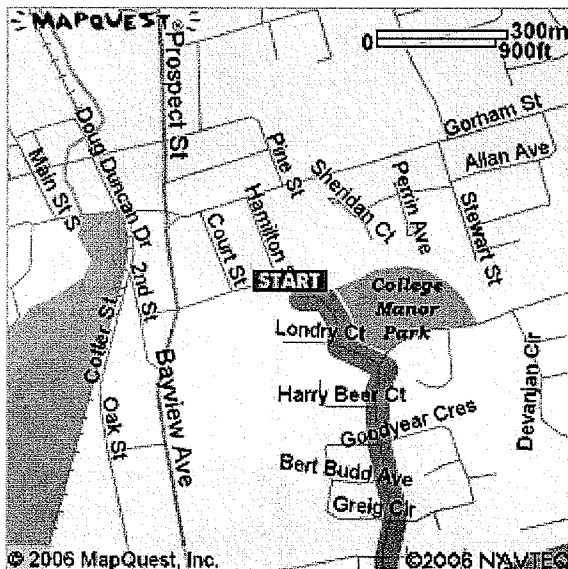
Total Est. Time: 4 hours, 32 minutes

Total Est. Distance: 256.69 miles



Start:
Newmarket, ON CA

End:
231 W Lafayette Blvd
Detroit, MI 48226-2700, US



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EXHIBIT K

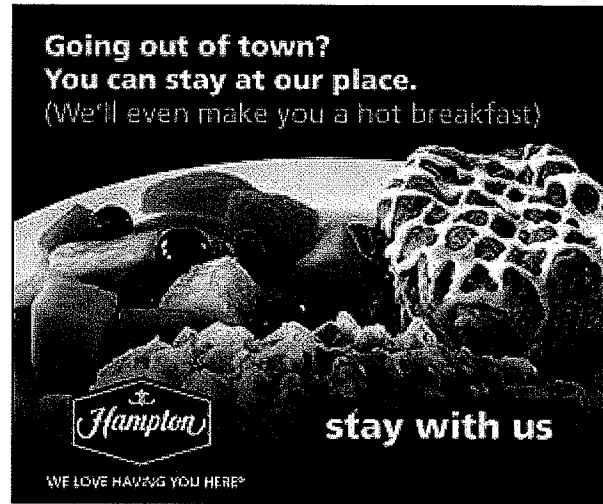
(PART 2 OF 4)



Start: Reynoldsburg, OH US

End: 844 N King St
Wilmington, DE 19801-3519, US

Notes:

















Directions

Distance

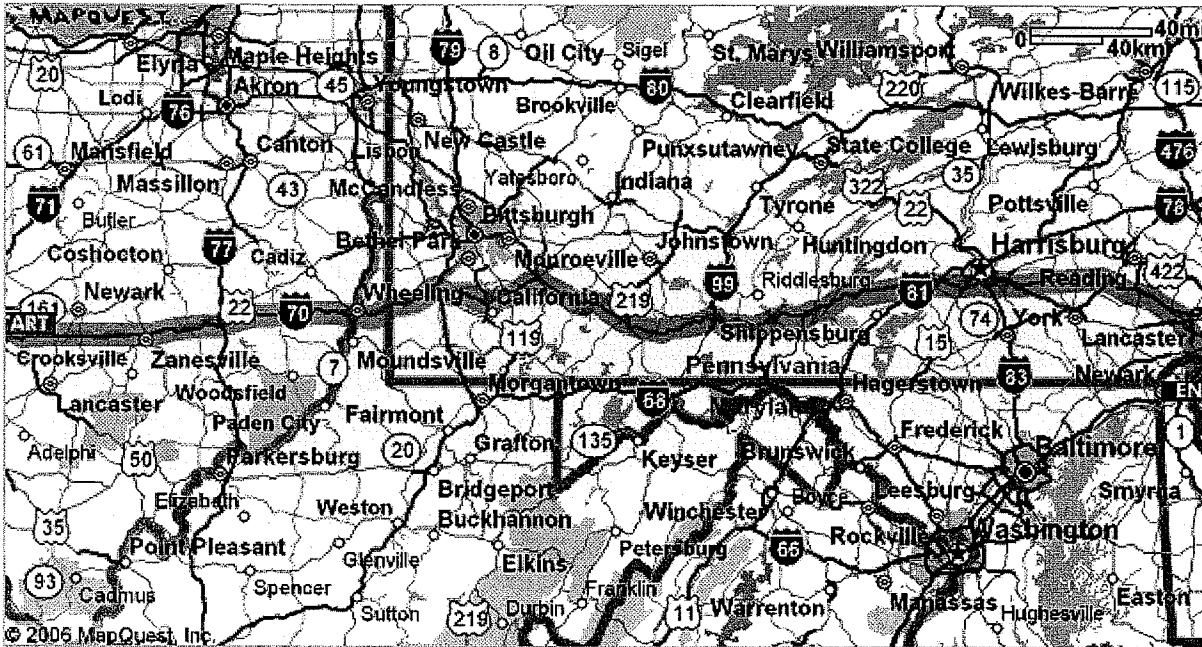
Total Est. Time: 7 hours, 40 minutes

Total Est. Distance: 451.91 miles

-  **1:** Start out going NORTH on BRIARCLIFF RD toward E MAIN ST / US-40. <0.1 miles
-  **2:** Turn RIGHT onto E MAIN ST / US-40. 0.5 miles
-  **3:** Turn RIGHT onto OH-256 / LANCASTER AVE. 0.1 miles
-  **4:** Turn LEFT onto OH-256 / LANCASTER AVE. Continue to follow OH-256 S. 1.6 miles
-  **5:** Merge onto I-70 E via the ramp on the LEFT toward WHEELING. 107.2 miles
-  **6:** Merge onto I-470 E via EXIT 219 toward BELLAIRE / WASHINGTON PA (Crossing into WEST VIRGINIA). 10.5 miles
-  **7:** Merge onto I-70 E (Crossing into PENNSYLVANIA). 66.7 miles
-  **8:** Merge onto I-76 E via EXIT 58 toward BREEZEWOOD / NEW JERSEY (Portions toll). 238.4 miles
-  **9:** Take the PA-100 exit- EXIT 312- toward POTTSTOWN / WEST CHESTER. 0.4 miles
-  **10:** Merge onto PA-100 S toward DOWNINGTOWN. 7.6 miles
-  **11:** Take US-202 S (Crossing into DELAWARE). 16.4 miles
-  **12:** US-202 S becomes DE-202 S. 1.2 miles
-  **13:** Turn RIGHT onto N MARKET ST / US-13 BR. Continue to follow US-13 BR S. 0.7 miles
-  **14:** End at 844 N King St
Wilmington, DE 19801-3519, US

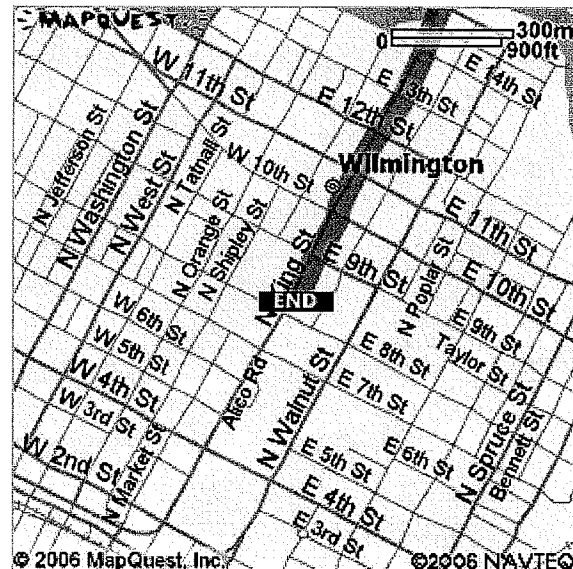
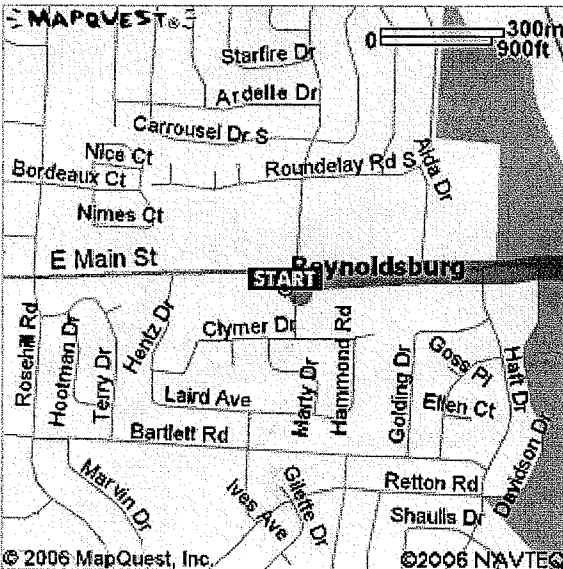
Total Est. Time: 7 hours, 40 minutes

Total Est. Distance: 451.91 miles



Start:
Reynoldsburg, OH US

End:
844 N King St
Wilmington, DE 19801-3519, US



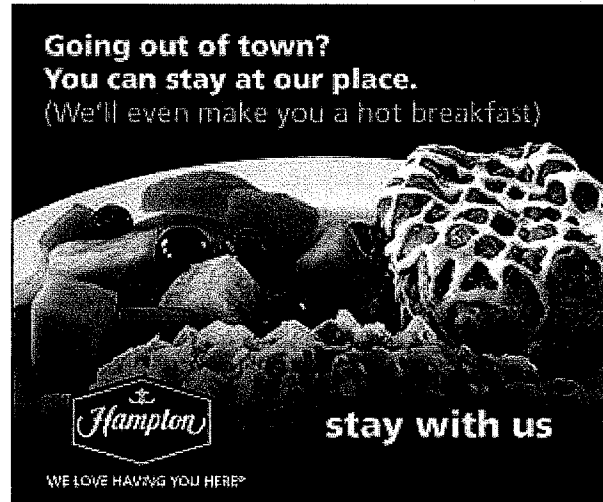
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Start: Reynoldsburg, OH US
End: 231 W Lafayette Blvd
 Detroit, MI 48226-2700, US

Notes:



Directions

Distance

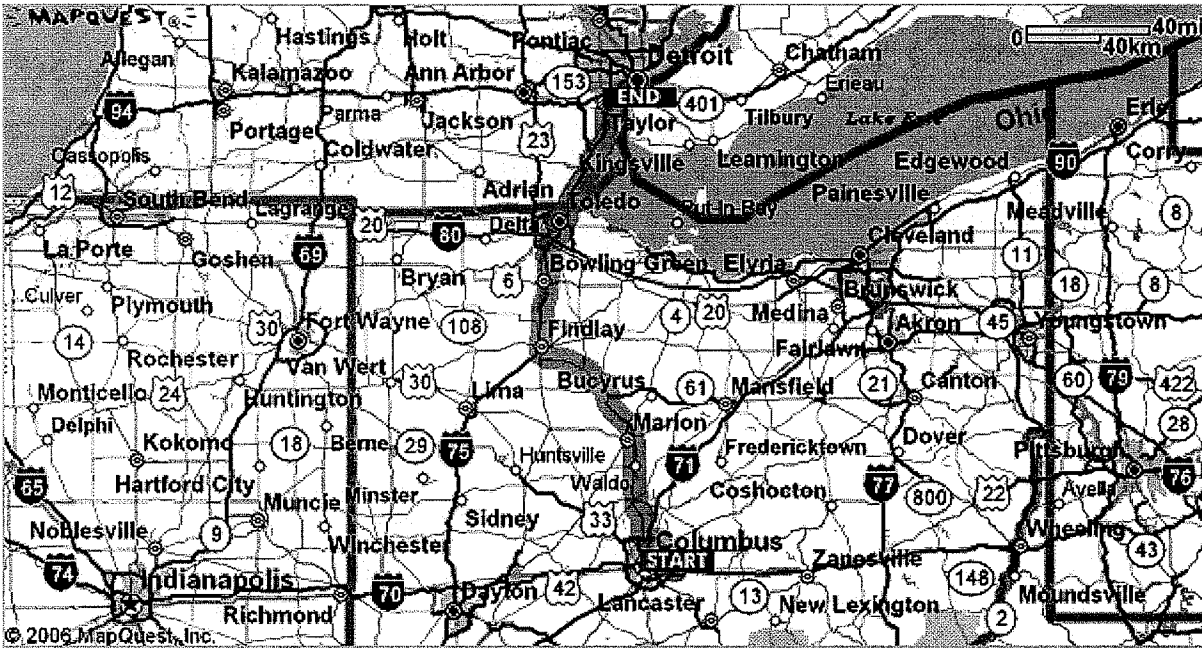
Total Est. Time: 3 hours, 36 minutes

Total Est. Distance: 208.32 miles

- | | | |
|--|--|-------------|
| | 1: Start out going NORTH on BRIARCLIFF RD toward E MAIN ST / US-40. | <0.1 miles |
| | 2: Turn LEFT onto E MAIN ST / US-40. | 1.4 miles |
| | 3: Merge onto I-270 N toward CLEVELAND. | 17.1 miles |
| | 4: Merge onto US-23 N via EXIT 23 toward DELAWARE. | 66.6 miles |
| | 5: Stay STRAIGHT to go onto OH-15 W. | 16.9 miles |
| | 6: Merge onto I-75 N toward TOLEDO (Crossing into MICHIGAN). | 103.9 miles |
| | 7: Take EXIT 49 toward M-10 / LODGE FWY / ROSA PARKS BLVD / CIVIC CENTER. | 0.3 miles |
| | 8: Take the exit on the LEFT toward M-10 / LODGE FWY / CIVIC CENTER. | 0.2 miles |
| | 9: Take the M-10 S exit toward CIVIC CENTER. | 0.6 miles |
| | 10: Merge onto JOHN C LODGE FWY / MI-10 S. | 0.2 miles |
| | 11: Take the HOWARD ST exit toward COBO ROOF. | 0.1 miles |
| | 12: Keep LEFT at the fork to go on 5TH ST. | <0.1 miles |
| | 13: Turn LEFT onto W LAFAYETTE BLVD. | 0.4 miles |
| | 14: End at 231 W Lafayette Blvd
Detroit, MI 48226-2700, US | |

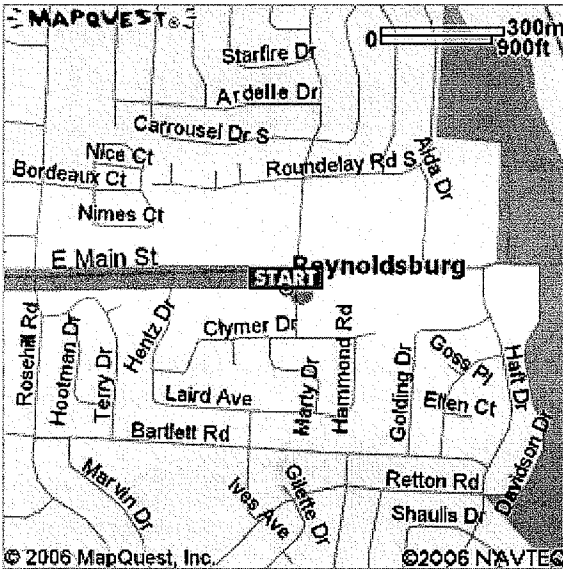
Total Est. Time: 3 hours, 36 minutes

Total Est. Distance: 208.32 miles



Start:
Reynoldsburg, OH US

End:
231 W Lafayette Blvd
Detroit, MI 48226-2700, US



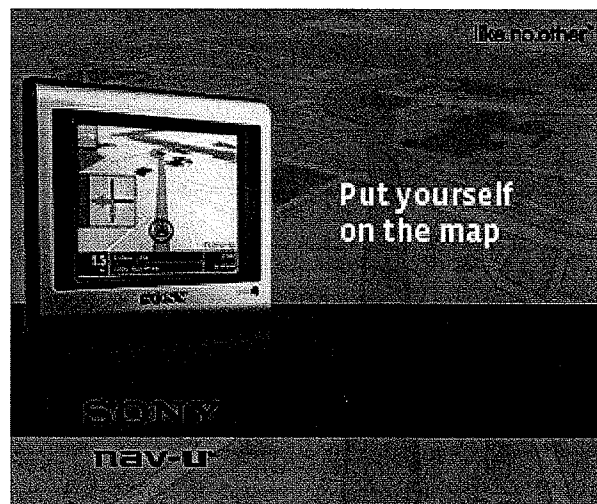
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Start: Boaz, AL US
End: 844 N King St
 Wilmington, DE 19801-3519, US

Notes:



Directions

Distance

Total Est. Time: 12 hours, 55 minutes

Total Est. Distance: 810.69 miles



1: Start out going EAST on COLLEGE AVE toward BEL AIR ST. <0.1 miles



2: Turn RIGHT onto N MAIN ST / AL-205. 0.1 miles



3: Turn LEFT onto AL-168 / W MILL AVE. 0.8 miles



4: Turn SLIGHT RIGHT onto US-431 S / AL-1 S. 14.4 miles



5: Turn RIGHT onto US-278 E / 5TH AVE NW / US-431 S / AL-1 S / AL-74 E. 0.8 miles



6: Merge onto I-59 N via the ramp on the LEFT (Crossing into GEORGIA). 77.6 miles



7: Merge onto I-24 E toward CHATTANOOGA (Crossing into TENNESSEE). 17.4 miles



8: Merge onto I-75 N via EXIT 185B on the LEFT toward KNOXVILLE. 100.5 miles



9: Take I-40 E toward KNOXVILLE. 36.3 miles



10: Merge onto I-81 N via EXIT 421 on the LEFT toward BRISTOL (Crossing into VIRGINIA). 376.1 miles



11: Merge onto I-66 E via EXIT 300 toward FORT ROYAL / WASHINGTON. 64.7 miles



12: Merge onto I-495 N / CAPITAL BELTWAY toward BALTIMORE (Crossing into MARYLAND). 21.5 miles



13: Merge onto I-95 N via EXIT 27 toward BALTIMORE / NEW YORK (Portions toll) (Crossing into DELAWARE). 98.7 miles



14: Take EXIT 7 toward SR-52 / DELAWARE AVE.. 0.1 miles



15: Turn SLIGHT LEFT onto N ADAMS ST. 0.2 miles

16: Turn SLIGHT RIGHT onto DELAWARE AVE / DE-52 S. Continue to follow 0.5 miles



DE-52 S.



17: Turn RIGHT onto N KING ST / US-13 BR S.

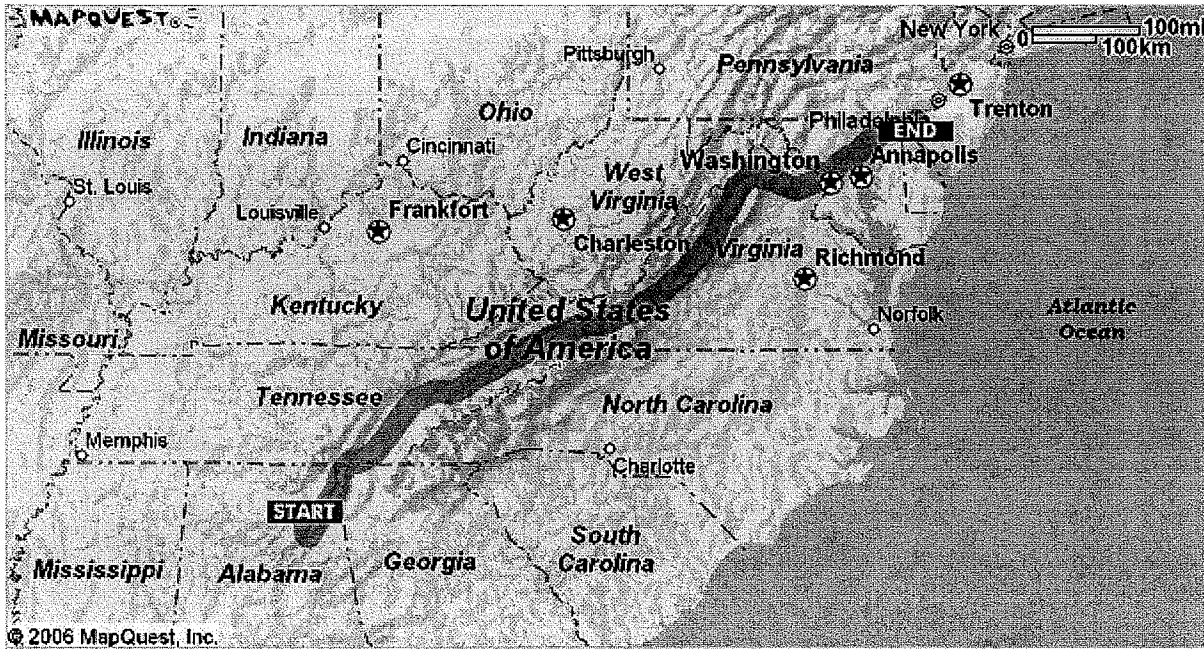
0.1 miles



18: End at **844 N King St**
Wilmington, DE 19801-3519, US

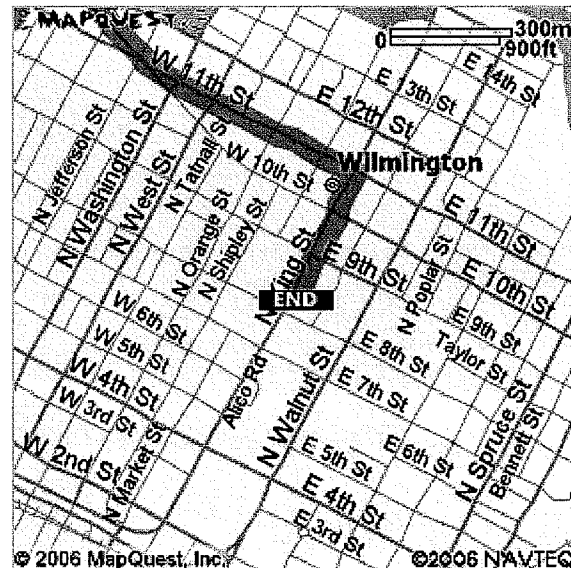
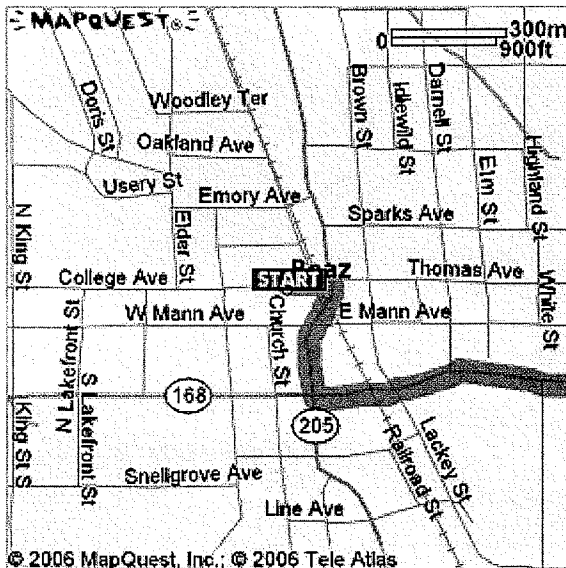
Total Est. Time: 12 hours, 55 minutes

Total Est. Distance: 810.69 miles



Start:
 Boaz, AL US

End:
 844 N King St
 Wilmington, DE 19801-3519, US



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EXHIBIT K

(PART 3 OF 4)



Start: Boaz, AL US

End: 231 W Lafayette Blvd
Detroit, MI 48226-2700, US

Notes:


















hotels.com

Directions

Distance

Total Est. Time: 11 hours, 29 minutes

Total Est. Distance: 724.90 miles

- | | | |
|---|---|-------------|
|  | 1: Start out going EAST on COLLEGE AVE toward BEL AIR ST. | <0.1 miles |
|  | 2: Turn RIGHT onto N MAIN ST / AL-205. | 0.1 miles |
|  | 3: Turn LEFT onto AL-168 / W MILL AVE. | 0.8 miles |
|  | 4: Turn SLIGHT RIGHT onto US-431 S / AL-1 S. | 14.4 miles |
|  | 5: Turn RIGHT onto US-278 E / 5TH AVE NW / US-431 S / AL-1 S / AL-74 E. | 0.8 miles |
|  | 6: Merge onto I-59 N via the ramp on the LEFT (Crossing into GEORGIA). | 77.6 miles |
|  | 7: Merge onto I-24 E toward CHATTANOOGA (Crossing into TENNESSEE). | 17.4 miles |
|  | 8: Merge onto I-75 N via EXIT 185B on the LEFT toward KNOXVILLE. | 103.9 miles |
|  | 9: Merge onto I-75 N via EXIT 3 toward LEXINGTON (Passing through KENTUCKY and OHIO- then crossing into MICHIGAN). | 507.4 miles |
|  | 10: Take EXIT 49 toward M-10 / LODGE FWY / ROSA PARKS BLVD / CIVIC CENTER. | 0.3 miles |
|  | 11: Take the exit on the LEFT toward M-10 / LODGE FWY / CIVIC CENTER. | 0.2 miles |
|  | 12: Take the M-10 S exit toward CIVIC CENTER. | 0.6 miles |
|  | 13: Merge onto JOHN C LODGE FWY / MI-10 S. | 0.2 miles |
|  | 14: Take the HOWARD ST exit toward COBO ROOF. | 0.1 miles |
|  | 15: Keep LEFT at the fork to go on 5TH ST. | <0.1 miles |
| | 16: Turn LEFT onto W LAFAYETTE BLVD. | 0.4 miles |

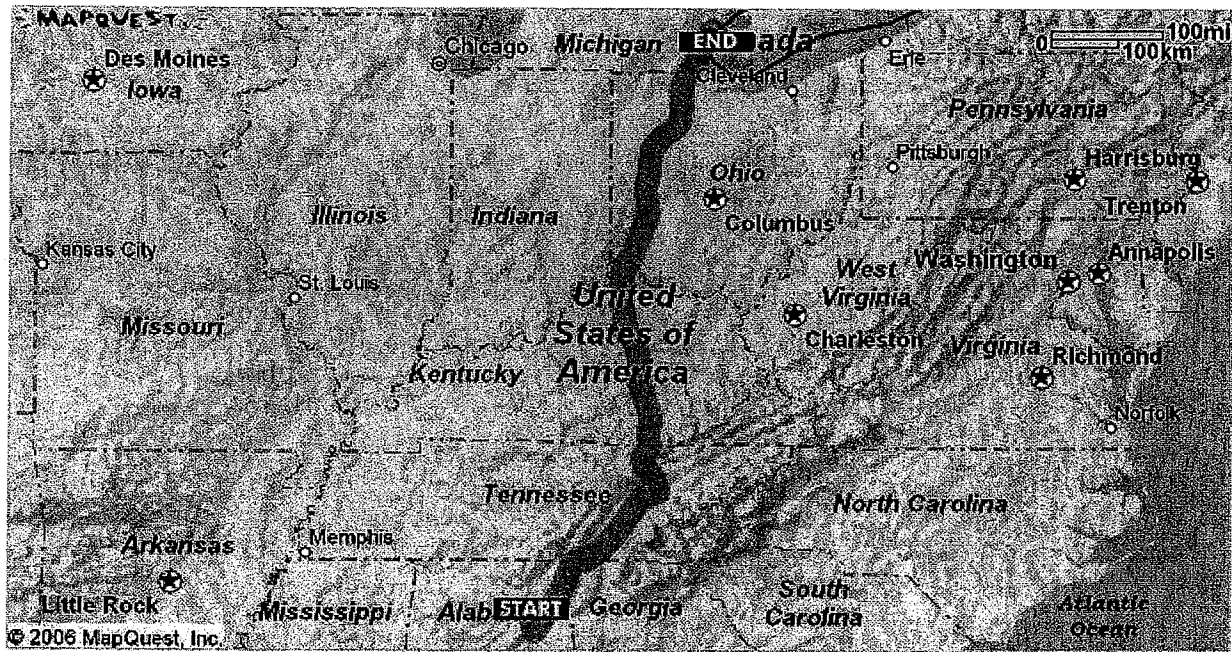


END

17: End at 231 W Lafayette Blvd
Detroit, MI 48226-2700, US

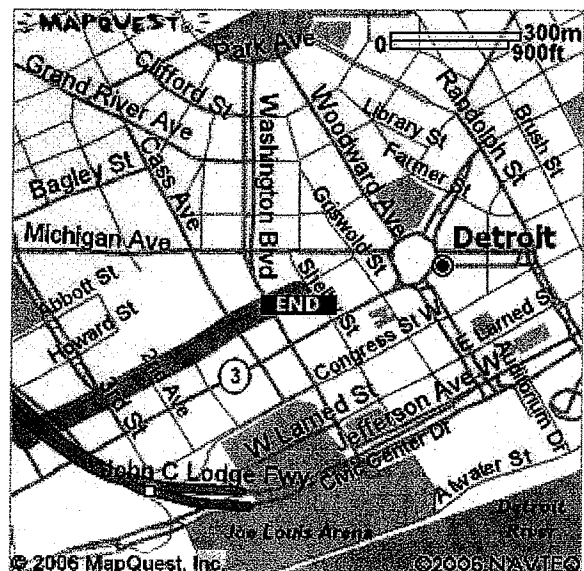
Total Est. Time: 11 hours, 29 minutes

Total Est. Distance: 724.90 miles



Start:
Boaz, AL US

End:
231 W Lafayette Blvd
Detroit, MI 48226-2700, US



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Start: Saint Marys, OH US
End: 844 N King St
 Wilmington, DE 19801-3519, US

Notes:

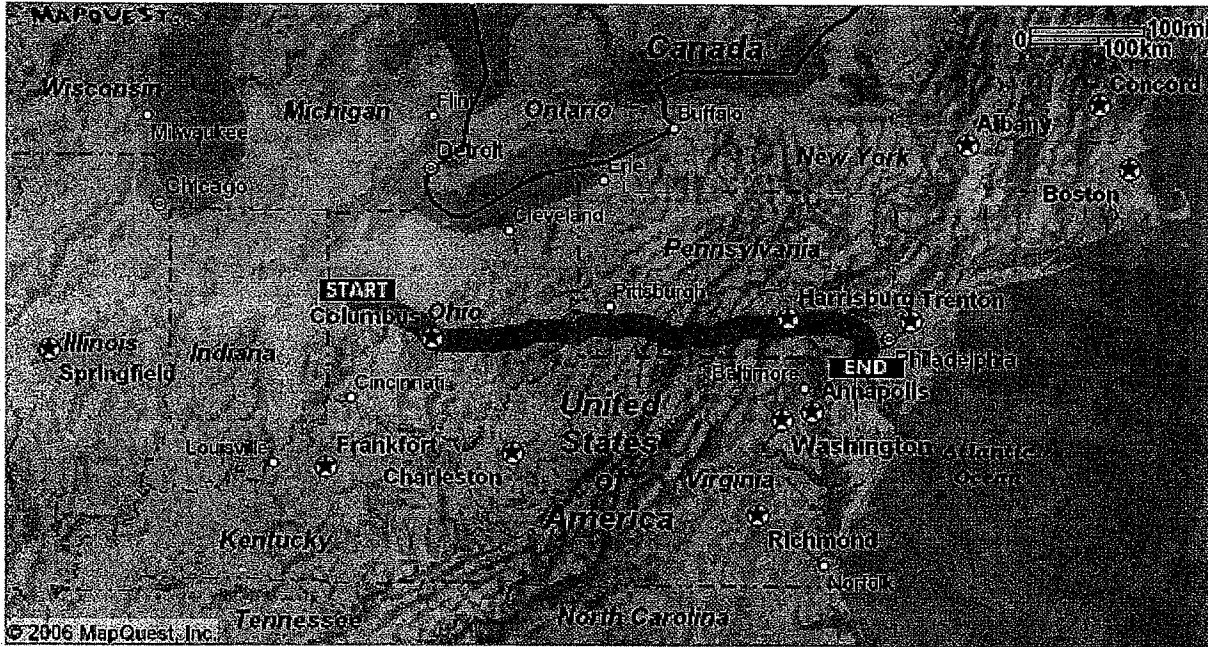


hotels.com

Directions

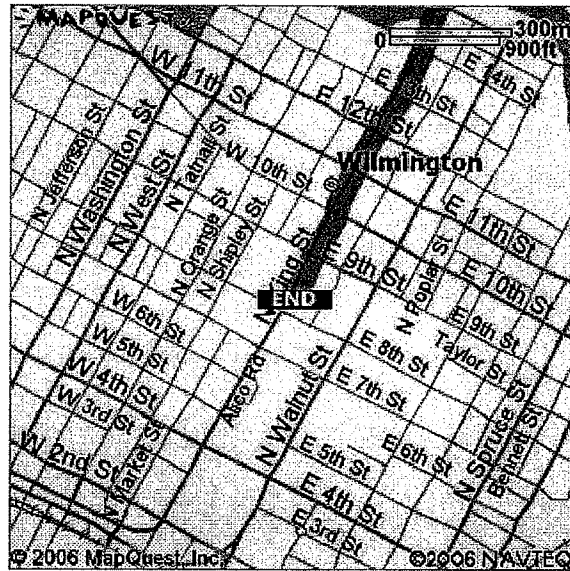
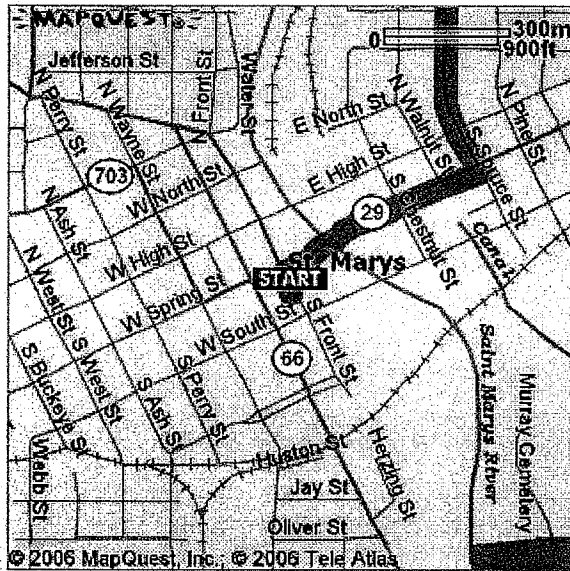
Distance

		Total Est. Time: 9 hours, 32 minutes	Total Est. Distance: 560.16 miles
	1: Start out going NORTHWEST on S FRONT ST toward OH-29 / OH-66 / W SPRING ST.	<0.1 miles	
	2: Turn RIGHT onto OH-29 / OH-66 / W SPRING ST.	0.3 miles	
	3: Turn LEFT onto OH-66 / N SPRUCE ST.	0.6 miles	
	4: Merge onto US-33 E.	81.4 miles	
	5: Merge onto I-270 S toward GROVE CITY.	8.1 miles	
	6: Merge onto I-70 E via EXIT 8 toward COLUMBUS.	127.2 miles	
	7: Merge onto I-470 E via EXIT 219 toward BELLAIRE / WASHINGTON PA (Crossing into WEST VIRGINIA).	10.5 miles	
	8: Merge onto I-70 E (Crossing into PENNSYLVANIA).	66.7 miles	
	9: Merge onto I-76 E via EXIT 58 toward BREEZEWOOD / NEW JERSEY (Portions toll).	238.4 miles	
	10: Take the PA-100 exit- EXIT 312- toward POTTSTOWN / WEST CHESTER.	0.4 miles	
	11: Merge onto PA-100 S toward DOWNINGTOWN.	7.6 miles	
	12: Take US-202 S (Crossing into DELAWARE).	16.4 miles	
	13: US-202 S becomes DE-202 S.	1.2 miles	
	14: Turn RIGHT onto N MARKET ST / US-13 BR. Continue to follow US-13 BR S.	0.7 miles	
	15: End at 844 N King St Wilmington, DE 19801-3519, US		
		Total Est. Time: 9 hours, 32 minutes	Total Est. Distance: 560.16 miles



Start:
Saint Marys, OH US

End:
844 N King St
Wilmington, DE 19801-3519, US



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Start: Saint Marys, OH US
End: 231 W Lafayette Blvd
Detroit, MI 48226-2700, US

Notes:



Directions	Distance
Total Est. Time: 2 hours, 41 minutes Total Est. Distance: 164.57 miles	
 1: Start out going NORTHWEST on S FRONT ST toward OH-29 / OH-66 / W SPRING ST.	<0.1 miles
 2: Turn RIGHT onto OH-29 / OH-66 / W SPRING ST.	0.3 miles
 3: Turn LEFT onto OH-66 / N SPRUCE ST.	0.6 miles
 4: Merge onto US-33 E.	11.4 miles
 5: Merge onto I-75 N toward TOLEDO (Crossing into MICHIGAN).	150.0 miles
 6: Take EXIT 49 toward M-10 / LODGE FWY / ROSA PARKS BLVD / CIVIC CENTER.	0.3 miles
 7: Take the exit on the LEFT toward M-10 / LODGE FWY / CIVIC CENTER.	0.2 miles
 8: Take the M-10 S exit toward CIVIC CENTER.	0.6 miles
 9: Merge onto JOHN C LODGE FWY / MI-10 S.	0.2 miles
 10: Take the HOWARD ST exit toward COBO ROOF.	0.1 miles
 11: Keep LEFT at the fork to go on 5TH ST.	<0.1 miles
 12: Turn LEFT onto W LAFAYETTE BLVD.	0.4 miles
 13: End at 231 W Lafayette Blvd Detroit, MI 48226-2700, US	
Total Est. Time: 2 hours, 41 minutes Total Est. Distance: 164.57 miles	



End:
231 W Lafayette Blvd
Detroit, MI 48226-2700, US



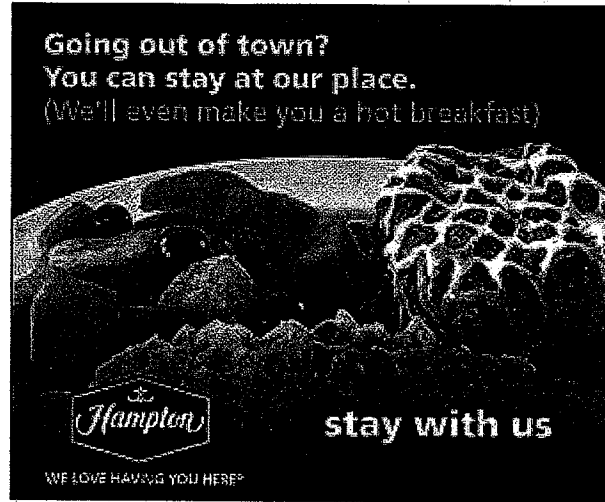
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Start: Eastaboga, AL US

End: 844 N King St
Wilmington, DE 19801-3519, US

Notes:



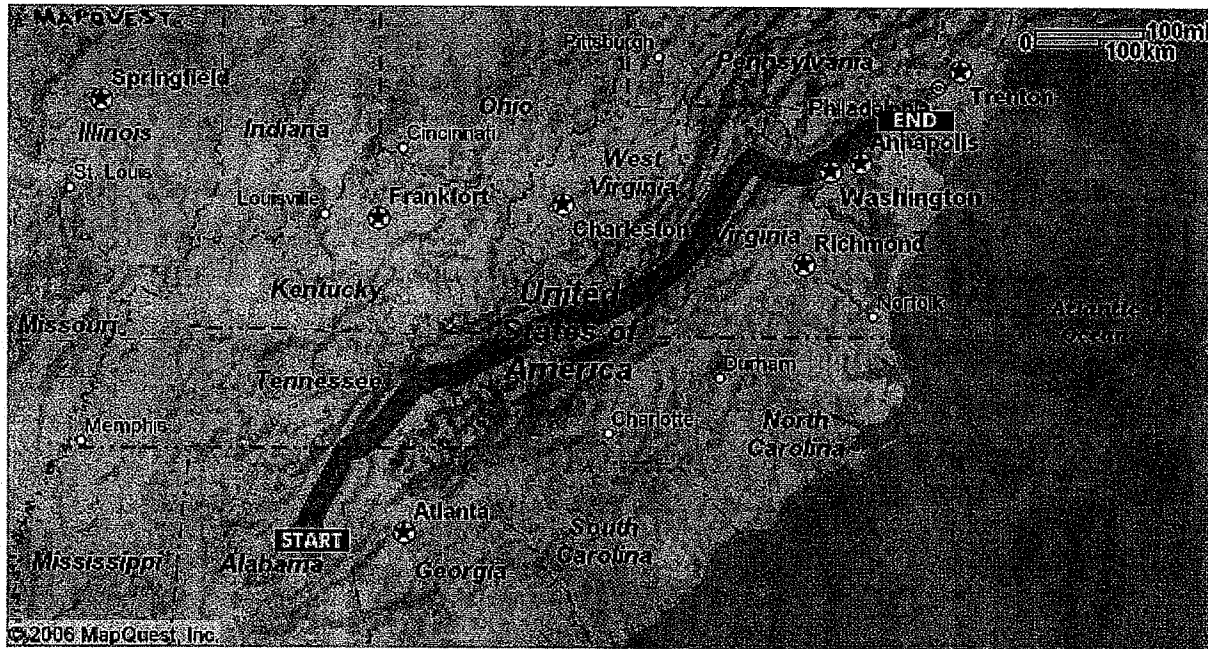
Directions	Distance
Total Est. Time: 13 hours, 21 minutes Total Est. Distance: 826.86 miles	
1: Start out going NORTH on CR-5 / MUDD ST toward WAITES RD. Continue to follow MUDD ST.	11.2 miles
2: Stay STRAIGHT to go onto CR-93 / MUDD ST.	0.3 miles
3: Turn RIGHT onto AL-77 N.	18.6 miles
4: Merge onto I-59 N via the ramp on the LEFT (Crossing into GEORGIA).	79.9 miles
5: Merge onto I-24 E toward CHATTANOOGA (Crossing into TENNESSEE).	17.4 miles
6: Merge onto I-75 N via EXIT 185B on the LEFT toward KNOXVILLE.	100.5 miles
7: Take I-40 E toward KNOXVILLE.	36.3 miles
8: Merge onto I-81 N via EXIT 421 on the LEFT toward BRISTOL (Crossing into VIRGINIA).	376.1 miles
9: Merge onto I-66 E via EXIT 300 toward FORT ROYAL / WASHINGTON.	64.7 miles
10: Merge onto I-495 N / CAPITAL BELTWAY toward BALTIMORE (Crossing into MARYLAND).	21.5 miles
11: Merge onto I-95 N via EXIT 27 toward BALTIMORE / NEW YORK (Portions toll) (Crossing into DELAWARE).	98.7 miles
12: Take EXIT 7 toward SR-52 / DELAWARE AVE..	0.1 miles
13: Turn SLIGHT LEFT onto N ADAMS ST.	0.2 miles
14: Turn SLIGHT RIGHT onto DELAWARE AVE / DE-52 S. Continue to follow DE-52 S.	0.5 miles
15: Turn RIGHT onto N KING ST / US-13 BR S.	0.1 miles
16: End at 844 N King St	

END

Wilmington, DE 19801-3519, US

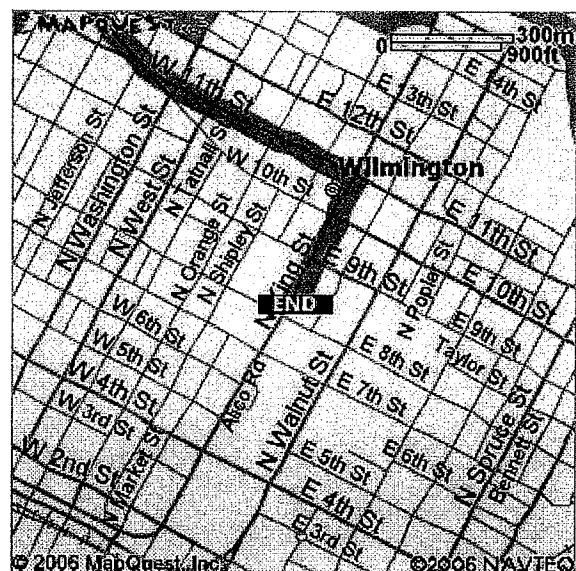
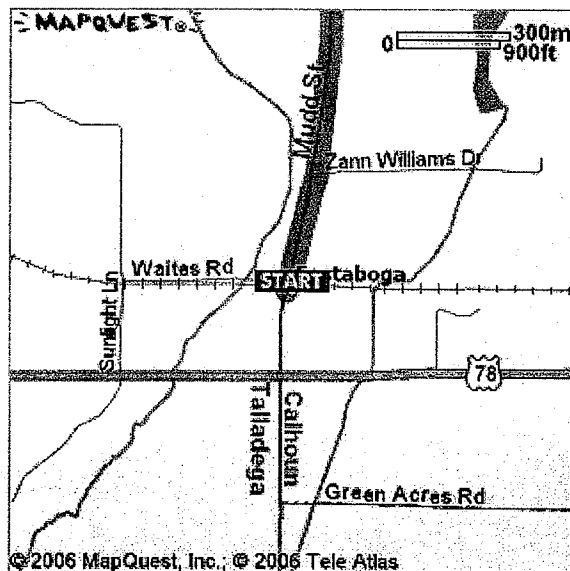
Total Est. Time: 13 hours, 21 minutes

Total Est. Distance: 826.86 miles



Start:
Eastaboga, AL US

End:
844 N King St
Wilmington, DE 19801-3519, US



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Start: Eastaboga, AL US

End: 231 W Lafayette Blvd
Detroit, MI 48226-2700, US

Notes:
















☒ Advertisement

Directions

Distance

Total Est. Time: 11 hours, 55 minutes

Total Est. Distance: 741.07 miles

- | | | |
|---|---|-------------|
|  | 1: Start out going NORTH on CR-5 / MUDD ST toward WAITES RD.
Continue to follow MUDD ST. | 11.2 miles |
|  | 2: Stay STRAIGHT to go onto CR-93 / MUDD ST. | 0.3 miles |
|  | 3: Turn RIGHT onto AL-77 N. | 18.6 miles |
|  | 4: Merge onto I-59 N via the ramp on the LEFT (Crossing into GEORGIA). | 79.9 miles |
|  | 5: Merge onto I-24 E toward CHATTANOOGA (Crossing into TENNESSEE). | 17.4 miles |
|  | 6: Merge onto I-75 N via EXIT 185B on the LEFT toward KNOXVILLE. | 103.9 miles |
|  | 7: Merge onto I-75 N via EXIT 3 toward LEXINGTON (Passing through KENTUCKY and OHIO- then crossing into MICHIGAN). | 507.4 miles |
|  | 8: Take EXIT 49 toward M-10 / LODGE FWY / ROSA PARKS BLVD / CIVIC CENTER. | 0.3 miles |
|  | 9: Take the exit on the LEFT toward M-10 / LODGE FWY / CIVIC CENTER. | 0.2 miles |
|  | 10: Take the M-10 S exit toward CIVIC CENTER. | 0.6 miles |
|  | 11: Merge onto JOHN C LODGE FWY / MI-10 S. | 0.2 miles |
|  | 12: Take the HOWARD ST exit toward COBO ROOF. | 0.1 miles |
|  | 13: Keep LEFT at the fork to go on 5TH ST. | <0.1 miles |
|  | 14: Turn LEFT onto W LAFAYETTE BLVD. | 0.4 miles |
|  | 15: End at 231 W Lafayette Blvd
Detroit, MI 48226-2700, US | |

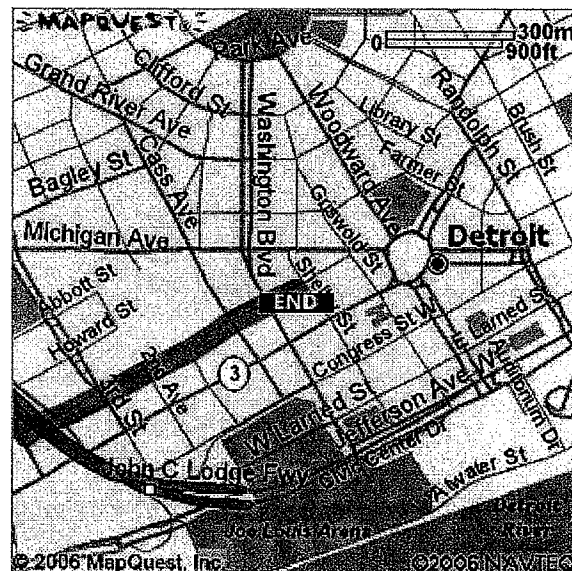
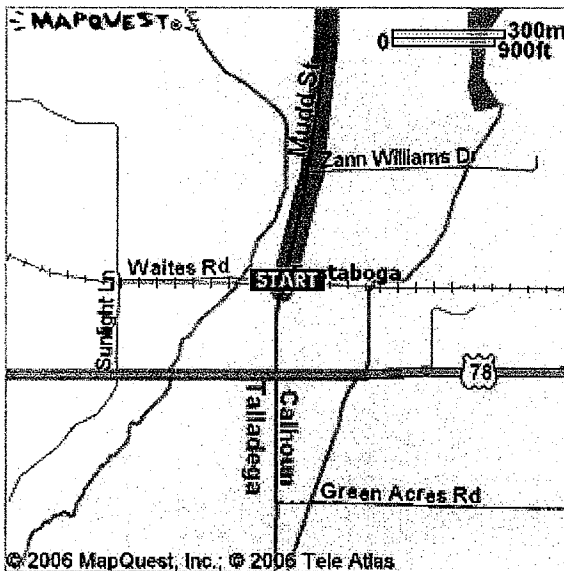
Total Est. Time: 11 hours, 55 minutes

Total Est. Distance: 741.07 miles



Start:
Eastaboga, AL US

End:
231 W Lafayette Blvd
Detroit, MI 48226-2700, US



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EXHIBIT K

(PART 4 OF 4)



Start: Shelburne, ON CA
End: 844 N King St
 Wilmington, DE 19801-3519, US

Notes:













Directions

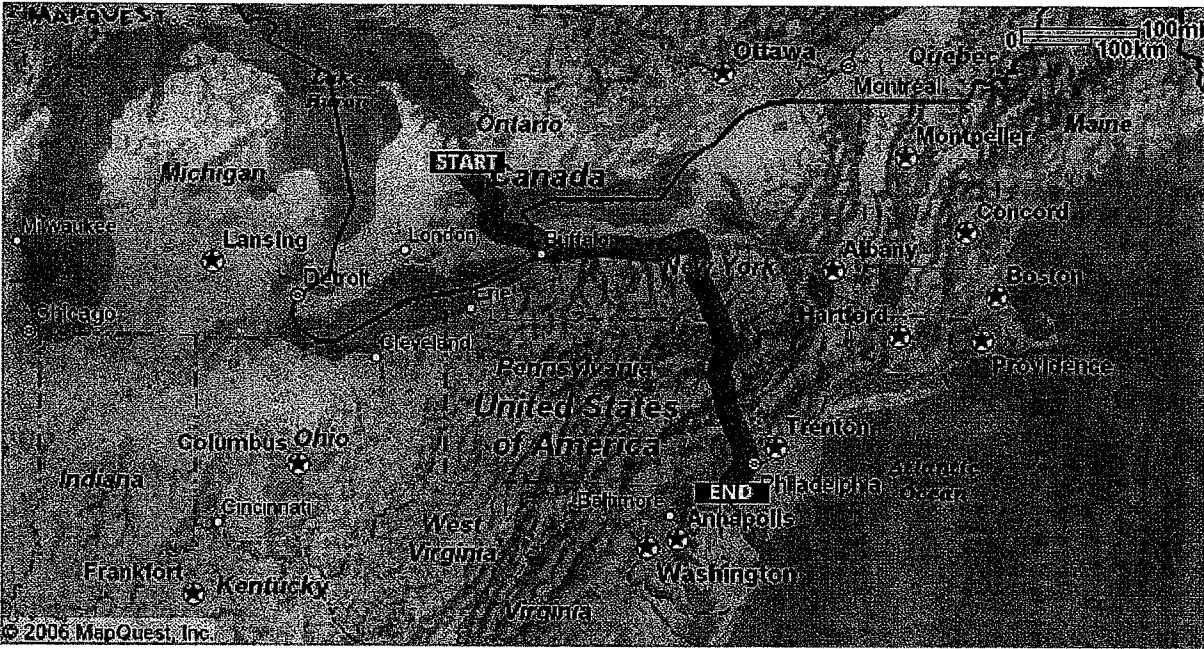
Distance

Total Est. Time: 9 hours, 25 minutes

Total Est. Distance: 551.85 miles

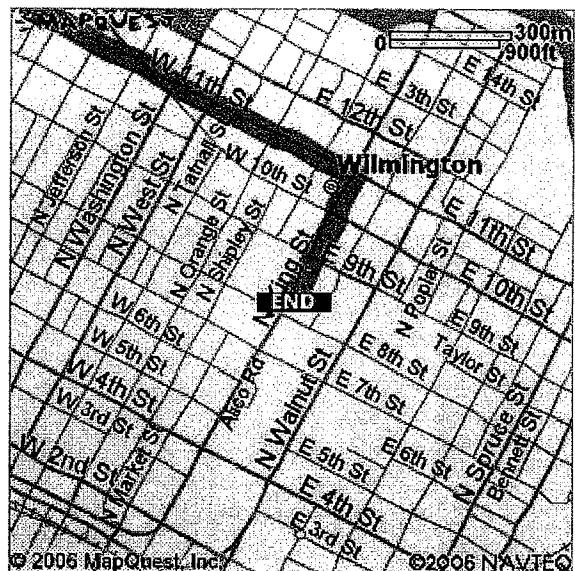
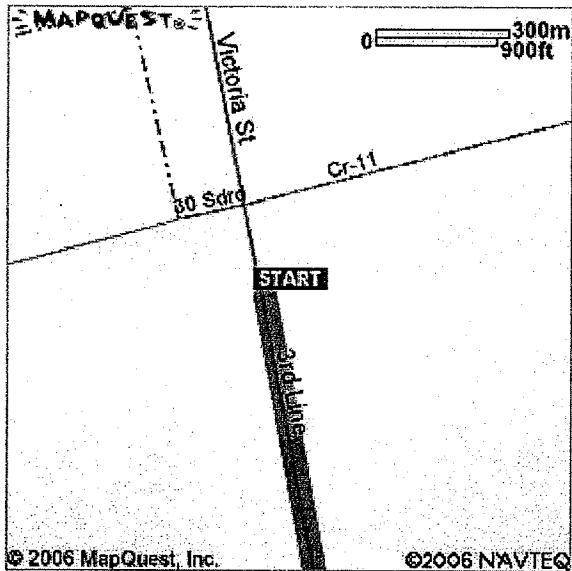
	1: Start out going SOUTH on 3RD LINE / CR-11 toward 25 SDRD.	3.7 miles
	2: Turn LEFT onto 20 SDRD.	3.3 miles
	3: Turn RIGHT onto PROVINCIAL ROUTE 10 / PROVINCIAL ROUTE 24. Continue to follow PROVINCIAL ROUTE 10.	28.8 miles
	4: Turn LEFT onto BOVAIRD DR / PROVINCIAL ROUTE 7.	1.5 miles
	5: Take the HWY-7 E / HWY-410 S ramp.	0.4 miles
	6: Merge onto PROVINCIAL ROUTE 410 S.	9.0 miles
	7: Take the RR-17 / CAWTHRA RD. / EASTGATE PKWY. exit on the LEFT.	0.2 miles
	8: Take the HWY-403 exit on the LEFT toward HAMILTON.	0.3 miles
	9: Merge onto PROVINCIAL ROUTE 403 W.	7.2 miles
	10: Merge onto HWY-407 ETR W via the exit on the LEFT (Portions toll).	15.2 miles
	11: Merge onto QEW toward NIAGARA.	39.5 miles
	12: Take the HWY-405 exit- EXIT 37- on the LEFT toward QUEENSTON.	0.2 miles
	13: Merge onto PROVINCIAL ROUTE 405 E.	5.1 miles
	14: PROVINCIAL ROUTE 405 E becomes QUEENSTON-LEWISTON BRIDGE (Crossing into *UNITED STATES* NEW YORK).	0.5 miles
	15: QUEENSTON-LEWISTON BRIDGE becomes I-190 S (Portions toll).	14.7 miles
	16: Merge onto I-290 E / YOUNGMANN EXPY via EXIT 16 toward I-90 / TONAWANDA / ROCHESTER.	9.8 miles

	17: Merge onto I-90 E / NEW YORK STATE THRUWAY E via EXIT 1-49 on the LEFT toward ALBANY (Portions toll).	130.7 miles
	18: Merge onto I-690 E via EXIT 39 toward SYRACUSE / FAIRGROUNDS.	9.8 miles
	19: Merge onto I-81 S (Crossing into PENNSYLVANIA).	124.1 miles
	20: Take the PENNSYLVANIA TURNPIKE exit- EXIT 194- toward US-6 / US-11 / CLARKS SUMMIT.	0.1 miles
	21: Merge onto I-476 S toward ALLENTOWN (Portions toll).	131.1 miles
	22: Merge onto I-95 S toward CHESTER (Crossing into DELAWARE).	14.7 miles
	23: Take EXIT 7A toward SR-52 S / DELAWARE AVE..	0.1 miles
	24: Stay STRAIGHT to go onto W 11TH ST.	0.5 miles
	25: Turn RIGHT onto N KING ST / US-13 BR S.	0.1 miles
	26: End at 844 N King St Wilmington, DE 19801-3519, US	
Total Est. Time: 9 hours, 25 minutes		Total Est. Distance: 551.85 miles



Start:
Shelburne, ON CA

End:
844 N King St
Wilmington, DE 19801-3519, US



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Start: Shelburne, ON CA

End: 231 W Lafayette Blvd
Detroit, MI 48226-2700, US

Notes:

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Guaranteed Lowest Internet Rates

Book Online and pay no booking fees







[Click Here to Make a Reservation!](#)

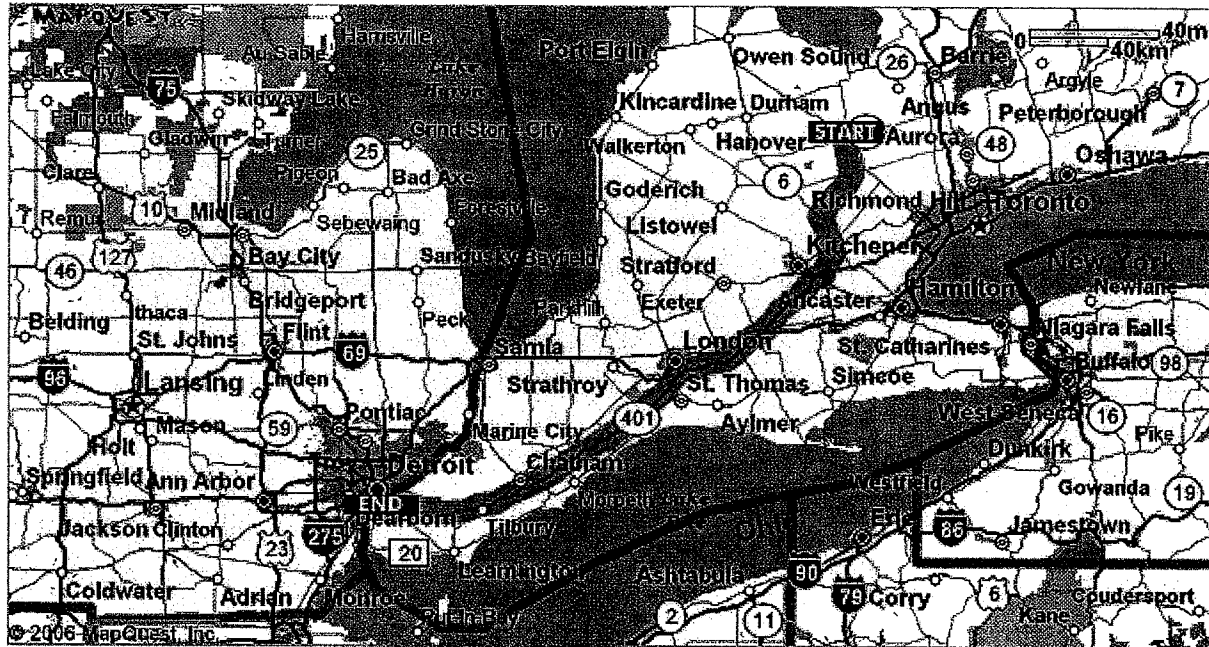
Or Call 877-410-6681 to make a reservation

Directions

Distance

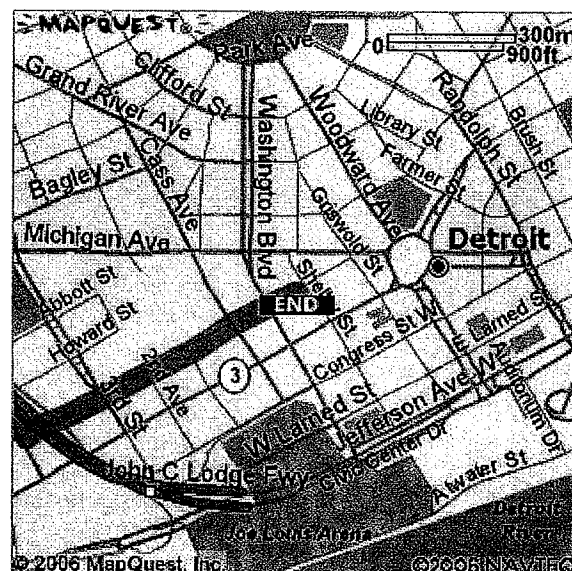
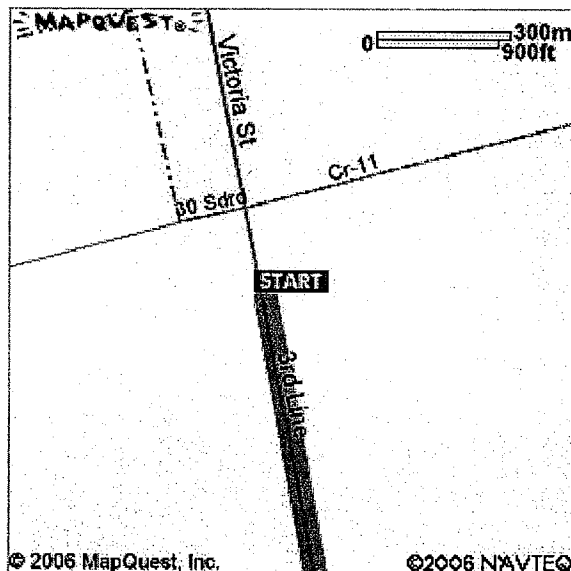
Total Est. Time: 4 hours, 31 minutes		Total Est. Distance: 233.24 miles
	1: Start out going SOUTH on 3RD LINE / CR-11 toward 25 SDRD. Continue to follow CR-11.	11.8 miles
	2: Turn RIGHT onto CR-3 / ORANGEVILLE / FERGUS RD.	10.4 miles
	3: CR-3 / ORANGEVILLE / FERGUS RD becomes CR-18.	7.6 miles
	4: Turn SLIGHT LEFT onto PROVINCIAL ROUTE 6 / TOWER ST S. Continue to follow PROVINCIAL ROUTE 6.	10.9 miles
	5: Turn RIGHT onto WOODLAWN RD W / PROVINCIAL ROUTE 6.	1.4 miles
	6: Turn LEFT onto HANLON PKWY / PROVINCIAL ROUTE 7 E / PROVINCIAL ROUTE 6 S.	2.1 miles
	7: Take the HWY-7 E / WELLINGTON ST. ramp toward ACTON.	0.2 miles
	8: Turn RIGHT onto WELLINGTON ST W / PROVINCIAL ROUTE 24. Continue to follow PROVINCIAL ROUTE 24 S.	8.6 miles
	9: Take the HWY-401 W ramp toward LONDON.	0.4 miles
	10: Merge onto PROVINCIAL ROUTE 401 W.	168.3 miles
	11: Stay STRAIGHT to go onto TALBOT RD E / PROVINCIAL ROUTE 3 N. Continue to follow PROVINCIAL ROUTE 3 N (Portions toll) (Crossing into *UNITED STATES* MICHIGAN).	7.4 miles
	12: PROVINCIAL ROUTE 3 N becomes AMBASSADOR BRIDGE.	0.7 miles
	13: AMBASSADOR BRIDGE becomes W FISHER FWY.	<0.1 miles
	14: Merge onto I-75 N toward DETROIT.	0.7 miles
	15: Take EXIT 49 toward M-10 / LODGE FWY / ROSA PARKS BLVD / CIVIC CENTER.	0.3 miles
	16: Take the exit on the LEFT toward M-10 / LODGE FWY / CIVIC CENTER.	0.2 miles

	17: Take the M-10 S exit toward CIVIC CENTER.	0.6 miles
	18: Merge onto JOHN C LODGE FWY / MI-10 S.	0.2 miles
	19: Take the HOWARD ST exit toward COBO ROOF.	0.1 miles
	20: Keep LEFT at the fork to go on 5TH ST.	<0.1 miles
	21: Turn LEFT onto W LAFAYETTE BLVD.	0.4 miles
	22: End at 231 W Lafayette Blvd Detroit, MI 48226-2700, US	
Total Est. Time: 4 hours, 31 minutes		Total Est. Distance: 233.24 miles



Start:
 Shelburne, ON CA

End:
 231 W Lafayette Blvd
 Detroit, MI 48226-2700, US



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These directions are informational only. No representation is made or warranty given as to their content, road conditions or route usability or expeditiousness. User assumes all risk of use. MapQuest and its suppliers assume no responsibility for any loss or delay resulting from such use.

EXHIBIT L

U.S. DISTRICT COURT - JUDICIAL CASELOAD PROFILE

					12-MONTH PERIOD ENDING SEPTEMBER 30							
DELAWARE					2005	2004	2003	2002	2001	2000	Numerical Standing	
OVERALL CASELOAD STATISTICS	Filings*				1,190	1,797	1,362	2,028	1,004	1,303	U.S.	Circuit
	Terminations				1,448	1,516	1,507	1,478	1,020	955		
	Pending				1,853	2,085	1,836	1,999	1,477	1,502		
	% Change in Total Filings		Over Last Year		-33.8						91	6
			Over Earlier Years			-12.6	-41.3	18.5	-8.7	70	5	
Number of Judgeships					4	4	4	4	4	4		
Vacant Judgeship Months**					.0	.0	1.9	3.1	.0	.0		
ACTIONS PER JUDGESHIP	FILINGS		Total	298	449	340	507	251	326	81	5	
			Civil	264	414	306	462	233	307	70	5	
			Criminal Felony	28	29	25	38	18	19	91	6	
			Supervised Release Hearings**	6	6	9	7	-	-	88	4	
	Pending Cases			463	521	459	500	369	376	26	3	
	Weighted Filings**			422	534	424	516	379	389	59	4	
	Terminations			362	379	377	370	255	239	71	4	
	Trials Completed			20	19	23	18	16	19	44	2	
MEDIAN TIMES (months)	From Filing to Disposition		Criminal Felony	9.4	9.1	8.3	9.8	8.0	6.6	58	1	
			Civil**	10.9	14.0	11.2	8.2	12.6	10.9	68	5	
	From Filing to Trial** (Civil Only)			23.5	26.0	24.0	22.5	21.0	24.0	47	2	
OTHER	Civil Cases Over 3 Years Old**		Number	156	65	66	99	77	70			
			Percentage	9.1	3.4	3.9	5.4	5.5	4.9	77	5	
	Average Number of Felony Defendants Filed Per Case			1.2	1.2	1.3	1.1	1.3	1.2			
	Jurors		Avg. Present for Jury Selection	39.82	38.50	34.98	33.84	32.68	35.75			
			Percent Not Selected or Challenged	22.8	20.9	24.0	24.4	19.9	28.5			

2005 CIVIL AND CRIMINAL FELONY FILINGS BY NATURE OF SUIT AND OFFENSE													
Type of	TOTAL	A	B	C	D	E	F	G	H	I	J	K	L
Civil	1055	28	5	252	7	3	36	92	50	149	149	63	221
Criminal*	110	1	27	16	23	20	6	**	5	4	-	6	2

* Filings in the "Overall Caseload Statistics" section include criminal transfers, while filings "By Nature of Offense" do not.

** See "Explanation of Selected Terms."

U.S. DISTRICT COURT - JUDICIAL CASELOAD PROFILE

			12-MONTH PERIOD ENDING SEPTEMBER 30							
MICHIGAN EASTERN			2005	2004	2003	2002	2001	2000	Numerical Standing	
OVERALL CASELOAD STATISTICS	Filings*		6,403	5,679	5,843	5,706	5,432	6,294	U.S.	Circuit
	Terminations		5,796	5,534	5,400	5,585	5,416	6,771		
	Pending		20,731	20,097	19,876	19,441	19,342	19,373		
	% Change in Total Filings	Over Last Year	12.7						7	1
		Over Earlier Years			9.6	12.2	17.9	1.7	47	5
Number of Judgeships			15	15	15	15	15	15		
Vacant Judgeship Months**			36.0	27.5	24.0	24.0	20.0	18.1		
ACTIONS PER JUDGESHIP	FILINGS	Total	427	379	389	380	362	420	54	5
		Civil	375	325	329	327	329	387	39	4
		Criminal Felony	36	40	45	40	33	33	85	9
		Supervised Release Hearings**	16	14	15	13	-	-	57	9
	Pending Cases		1,382	1,340	1,325	1,296	1,289	1,292	2	1
	Weighted Filings**		431	406	426	404	387	396	58	8
	Terminations		386	369	360	372	361	451	69	9
	Trials Completed		11	12	11	13	13	11	81	7
MEDIAN TIMES (months)	From Filing to Disposition	Criminal Felony	13.0	11.4	9.8	11.0	11.4	10.1	90	9
		Civil**	9.9	9.7	9.7	9.4	9.4	9.7	50	3
	From Filing to Trial** (Civil Only)		22.0	22.0	23.8	21.0	21.7	20.5	36	2
OTHER	Civil Cases Over 3 Years Old**	Number	14,935	14,923	14,876	14,857	14,763	10,456		
		Percentage	75.1	77.5	77.8	79.1	78.7	55.7	93	9
	Average Number of Felony Defendants Filed Per Case		1.6	1.6	1.5	1.6	1.8	1.9		
	Jurors	Avg. Present for Jury Selection	57.80	56.08	61.29	44.52	38.79	39.34		
		Percent Not Selected or Challenged	51.4	44.4	52.4	44.0	38.0	42.1		

2005 CIVIL AND CRIMINAL FELONY FILINGS BY NATURE OF SUIT AND OFFENSE													
Type of	TOTAL	A	B	C	D	E	F	G	H	I	J	K	L
Civil	5625	260	689	1006	84	74	636	953	324	208	858	8	525
Criminal*	537	41	144	40	124	78	27	15	18	8	11	17	14

* Filings in the "Overall Caseload Statistics" section include criminal transfers, while filings "By Nature of Offense" do not.

** See "Explanation of Selected Terms."

EXPLANATION OF SELECTED TERMS

Vacant Judgeship Months

"Vacant judgeship months" is the total number of months that vacancies occurred in any judgeship position in a circuit or district. On September 30, 2005, a total of 36 vacancies existed in the district courts, and 12 vacancies existed in the U.S. courts of appeals (excluding the Federal Circuit). In November 2004, one temporary judgeship lapsed in the Eastern District of California. Although the loss occurred during the 12-month period, per-judgeship calculations for the entire year were made using the reduced number of judgeship authorizations.

Visiting Judge Activity

Court profiles for both the courts of appeals and district courts reflect only caseloads within the circuit/district; the profiles do not address visiting judge activity in other circuits/districts. Detailed data on visiting judge activity can be found in Tables V-1 and V-2 of *Judicial Business of the United States Courts*.

Supervised Release Hearings

Beginning with 2002 *Federal Court Management Statistics*, data on hearings on violations of supervised release are included in the district court profiles. These hearings, which are conducted when defendants violate the terms of supervised release, can result in the modification of conditions or the revocation of supervised release. In addition to providing data for the category of supervised release hearings filed per authorized judgeship, data on supervised release hearings are included in the totals for overall filings and terminations, filings and terminations per authorized judgeship, and weighted filings per authorized judgeship. These changes to the district court profiles were approved by the Judicial Conference Subcommittee on Judicial Statistics.

Weighted Filings

Weighted filings statistics account for the different amounts of time district judges require to resolve various types of civil and criminal actions. The federal Judiciary has employed techniques for assigning weights to cases since 1946. In 2004, the Judicial Resources Committee of the Judicial Conference of the United States approved a new civil and criminal case weighting system proposed by the Federal Judicial Center. On a national basis, weighted filings did not change significantly after the implementation of the new case weights. More than two-thirds of all district courts saw their weighted filings change by 10 percent or less. Average civil cases or criminal defendants each receive a weight of approximately 1.0; for more time-consuming cases, higher weights are assessed (e.g., a death-penalty habeas corpus case is assigned a weight of 12.89); and cases demanding relatively little time from judges receive lower weights (e.g., a defaulted student loan case is assigned a weight of 0.031). Probation revocation hearings (both evidentiary and non-evidentiary) are included as part of the weighted filings statistics. For comparative analysis in this report, the totals for weighted civil and criminal filings for prior years have been revised based on the new case weighting system. The weighted totals for criminal defendants include reopenings and transfers. Data on civil cases arising by reopening, remand, and transfer to the district by order of the Judicial Panel on Multidistrict Litigation are not included among the totals for weighted filings.

Median Times: Civil

"Median times" are the median time intervals between the filing of cases and their disposition. Civil median times exclude data for civil cases involving land condemnation, prisoner petitions, deportation reviews, recovery of overpayments, and enforcements of judgments. Because courts can quickly process cases involving the recovery of overpayments (which primarily address veterans' benefits) and enforcements of judgments (which primarily address student loans), including data on these cases would shorten the civil median times for some courts to the point of giving an inaccurate impression of the time usually required to process a case in the federal courts.

Median Times: From Filing to Trial

The median time for civil cases from filing to trial is calculated from the date a case was filed to the date trial began. For any reopened civil case resulting in a second completed trial, the median time remains based on the original filing date and the date the trial was completed.

Civil Cases Over Three Years Old

Data for cases pending three years or more may not match those presented in the Civil Justice Reform Act (CJRA) reports because the profiles presented herein include data for cases on appeal in other courts (i.e., the Supreme Court, courts of appeals, other district courts, and state courts), whereas the CJRA reporting guidelines exclude such data. From 2000 to 2005, data for the Eastern District of Michigan included between 10,000 and 14,000 silicone breast implant cases assigned to one district judge that technically were pending, but effectively were stayed pending the resolution of an appeal in a related bankruptcy matter. On October 6, 2005, an order dismissed the 14,000 breast implant cases pursuant to the In re Dow Corning Corporation Bankruptcy Joint Amended Plan of Reorganization which went into effect on June 1, 2004. Since 1999, the three-year-old civil pending caseload in the Middle District of Louisiana has included more than 7,000 cases related to oil refinery explosions. For comparative purposes, any statistical average should exclude these cases.

Civil and Criminal Felony Filings by Nature of Suit/Offense

Prior to 2005, alphabetical codes corresponded to different offenses and natures of suit. Therefore, data for 2005 and thereafter are not comparable to data for earlier years.

EXHIBIT M



US006958451B2

(12) **United States Patent**
Breed et al.

(10) Patent No.: **US 6,958,451 B2**
(45) Date of Patent: **Oct. 25, 2005**

(54) **APPARATUS AND METHOD FOR MEASURING WEIGHT OF AN OCCUPYING ITEM OF A SEAT**

(75) Inventors: **David S. Breed**, Boonton Township, Morris County, NJ (US); **Wilbur E. Du Vall**, Kimberling City, MO (US); **Wendell C. Johnson**, Signal Hill, CA (US)

(73) Assignee: **Automotive Technologies International, Inc.**, Denville, NJ (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 67 days.

(21) Appl. No.: **10/174,803**

(22) Filed: **Jun. 19, 2002**

(65) **Prior Publication Data**

US 2003/0056997 A1 Mar. 27, 2003

Related U.S. Application Data

(63) Continuation-in-part of application No. 09/901,879, filed on Jul. 9, 2001, now Pat. No. 6,555,766, which is a continuation of application No. 09/849,559, filed on May 4, 2001, which is a continuation-in-part of application No. 09/193,209, filed on Nov. 17, 1998, now Pat. No. 6,242,701, which is a continuation-in-part of application No. 09/128,490, filed on Aug. 4, 1998, now Pat. No. 6,078,854, which is a continuation-in-part of application No. 08/970,822, filed on Nov. 14, 1997, now Pat. No. 6,081,757, and a continuation-in-part of application No. 08/474,783, filed on Jun. 7, 1995, now Pat. No. 5,822,701, application No. 10/174,803, which is a continuation-in-part of application No. 09/849,559, which is a continuation-in-part of application No. 09/193,209, which is a continuation-in-part of application No. 09/128,490, which is a continuation-in-part of application No. 08/970,822, and a continuation-in-part of application No. 08/474,783, application No. 10/174,803, which is a continuation-in-part of application No. 09/770,974, filed on Jan. 26, 2001, now Pat. No. 6,648,367, and a continuation-in-part of application No. 09/767,020, filed on Jan. 23, 2001, now Pat. No. 6,533,316, and a

continuation-in-part of application No. 09/753,186, filed on Jan. 2, 2001, now Pat. No. 6,484,080, application No. 10/174,803, which is a continuation-in-part of application No. 09/500,346, filed on Feb. 8, 2000, now Pat. No. 6,442,504, which is a continuation-in-part of application No. 09/128,490, which is a continuation-in-part of application No. 08/970,822, and a continuation-in-part of application No. 08/474,783.

(51) Int. Cl.⁷ **B60R 21/32**
(52) U.S. Cl. **177/1; 177/144; 702/101; 180/273; 280/735; 701/45**
(58) Field of Search **701/45; 702/101, 702/102; 180/273; 280/735; 177/136, 144, 210 R, 1**

(56) **References Cited**

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(Continued)

Primary Examiner—Randy W. Gibson

(74) *Attorney, Agent, or Firm*—Brian Roffe

(57) **ABSTRACT**

Arrangement and method for determining weight of an occupying item in a seat including one or more weight sensors arranged to obtain a measurement of the force applied to the seat, a forcing function determination arrangement for measuring a forcing function of the seat and a processor coupled to the weight sensor(s) and forcing function determination arrangement for receiving the measurement of the force applied to the weight sensor(s) and the measurement of the forcing function from the forcing function measurement system and determining the weight of the occupying item based thereon. The forcing function determination arrangement may include an accelerometer and measures effects on the seat caused by load of a seatbelt associated with the seat and/or effects on the seat of road roughness, steering maneuvers, and a vehicle suspension system.

39 Claims, 36 Drawing Sheets

